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Holtec Decommissioning International, LLC Indian Point Nuclear Generating, Unit Nos. 1, 2, and 3 Post-Shutdown Decommissioning Activities Report

Comment On: NRC-2021-0125-0002

Holtec Decommissioning International, LLC; Indian Point Nuclear Generating, Unit Nos. 1, 2, and 3; Post-Shutdown Decommissioning Activities Report

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General Comment

Problems with Holtec's planned spent fuel handling and dry storage systems include:

Cask and Canister issues: 20 - 25 year warranty on canisters and cask system

10 mRem limit in Joint Proposal should be honored (RW), as opposed to 25mRem required by NRC

Visual inspection of canisters is not adequate (see below under monitoring). There are no pressure monitors or relief valves to assess and protect canister integrity. The Nuclear Waste Technical Review Board recommends that Spent Nuclear Fuel (SNF) and its containment must be maintained, monitored, and retrievable in a manner that prevents radioactive leaks and hydrogen gas explosion.

Holtec plans to continue to use a containment system for Spent Nuclear Fuel (SNF) of thin-walled canisters ($\frac{1}{2}$ " -- $\frac{5}{8}$ ") inside thicker concrete casks lined up like bowling pins on a concrete tarmac -- a configuration which is more vulnerable to terrorism than Hardened Onsite Storage (HOSS), which could be much safer and should be explored. In Europe and many other countries nuclear waste is stored in more robust canister systems (10" - 20" thick) and often in hardened buildings.

High Burnup Fuel: About 60% of Indian Point's spent fuel inventory is high-burnup (HBU) fuel, which is much hotter and more radioactive than ordinary spent fuel, and requires at least seven years or more before moving it to dry cask storage. Holtec's plan to compress this process to three years or less may reduce costs, but also puts workers and the surrounding community in jeopardy.

Inadequate Site Remediation: Holtec's preliminary Post Activities Shutdown Report (PSDAR) indicates

that it will do nothing to remediate radiological contamination known to be leaking into the groundwater and the Hudson River, and that it will only superficially remediate contaminated soils,

Radiation Monitoring: Holtec's Post shutdown plan makes no provision for effective, accurate, off-site radiation monitoring despite the fact that radioactive particles and gasses are expected to be released into the air during the demolition of structures on site. The NRC has no requirement for offsite monitoring and therefore absolves Holtec from paying for it. There is also no plan to detect increasing pressure or temperature, container crack formation, or other problems that can lead to radiation leakage from the sealed thin-walled canisters they plan to use -- nor any way to respond to and remediate a leak or other failure, should it occur.

Perimeter monitoring is not adequate to capture issues directly at the work site which can impact the workers.

Offsite monitoring is needed, especially at nearby elementary school.

At Bruce Units 1 & 2 in Ontario, Canada more than 500 workers were exposed to radioactive dust and volatilized isotopes while cutting channel tubes that needed to be replaced.

Pipeline Risks: Indian Point is not only located at the intersection of two earthquake faults, it is also unique in that it has the Algonquin and a new 42" high-pressure AIM gas pipelines running under and adjacent to the facility. No other nuclear site in the nation is so threatened by pipelines. Demolition work inherent to decommissioning elevates the hazard. NYS and multiple independent experts recognize the risk. However, the pipelines are not even mentioned in Holtec's PSDAR. The NRC's Office of Inspector General (OIG) harshly criticized the NRC staff for dismissing the danger of an explosion as "not credible, and instead ignoring key data and tailoring its modeling of explosion risks to fit the desired foregone conclusion that no action is necessary.

Earthquake Zones should be studied further to have a full picture of the environment in which the decommissioning will take place. Request information from Columbia University Lamont Dougherty Earth Observatory (LDEO)

North Anna: Dominion is seeking a license to build a new plant, despite the Aug. 23 earthquake at North Anna 1 & 2, which didn't meet seismic standards -- but they are now designing Unit 3 to do so. Units 1 & 2 are still operating

Information on two earthquake zones has been scrubbed from record (Paul G., please elaborate)

Emergency Planning and Response: In the Joint Proposal, NYSDHSES will oversee Emergency Management and Response, with funding provided by Holtec, starting at \$1,000,000 per reactor in 2022, decreasing when all the radioactive fuel is move to dry cask storage and then dropping to \$250,00 -- \$750,000 depending on when that transfer is completed, and to \$100,000 after Partial Site Release and as low as \$25,000 until License Termination. Although dangers resulting from failure of a reactor, steam turbines, transformer explosions or other major failures have decreased since the plant ceased operation, nearly 2,000 tons of highly radioactive fuel is stored on site and dismantling the facility poses new dangers and the need for emergency planning will continue as long as waste is stored on site.