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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

Holtec's Plan (PSDAR) gives woefully inadequate or non-existent treatment to key safety and financial issues affecting the New York Metropolitan Area.

Cask and Canister Issues

20-25 year warranty on canisters & cask system is inadequate.

Visual inspection of canisters is not adequate, Pressure monitors or relief valves are needed to prevent radioactive leaks and hydrogen gas explosion.

Thin-walled steel canisters containing fuel rods are inside thicker concrete casks. The casks are lined up like bowling pins making them vulnerable to terrorism. Hardened Onsite Storage should be considered. High-Burnup Fuel is much hotter and more radioactive than ordinary spent fuel and should be allowed to stay in the fuel pool at least seven years or more before moving to dry cask storage, not three years or less that is currently being proposed.

Radiation Monitoring

There is no plan for accurate off-site radiation monitoring, nor is there any way to detect increasing pressure, temperature or crack formation in the canisters. There is no way to remediate a leak on site or repair a damaged cask.

Perimeter monitoring of the site will not capture problems onsite that can impact workers.

Offsite monitoring is needed, especially at the nearby elementary school.

Pipeline Risks

Holtec's plan does not even mention Algonquin's 42" high-pressure and other AIM gas pipelines adjacent

to IP. Demolition work will increase the hazard of explosion risk with the spent fuel being in the blast radius under some scenarios.

These gas pipelines should be shut down during decommissioning.

Earthquake Zones in the area should be studied further, given the advances in this field since the plant was constructed.

Emergency Planning and Response needs to be continued as long as spent fuel is stored onsite.

Transportation of highly radioactive fuel rods

The plan currently calls for barge transportation down the Hudson River. This poses risk to river towns and the New York City metropolitan area.

Transportation across the country by road and rail will threaten safety of neighborhoods along route.

Aging infrastructure along the proposed roads has not been assessed for capability to handle 120,000 metric tons of nuclear waste and emergency responses have not been planned.

Environmental Justice Concerns about the disproportionate impact of decommissioning, transportation and storage of spent nuclear fuel on communities of color and low income, especially indigenous and Latinx communities, have not been considered. Many of these same communities have already suffered from uranium mining and processing, and could now be forced to host storage facilities against their will. The Governor of New Mexico, along with other elected officials, has notified the NRC that they do not consent to high level radioactive waste being shipped to their state. We need to stand in solidarity with them.

Autopsy IP to assess aging impacts that can inform closing decisions in other plants.

Financial Risk to New Yorkers

If the \$2.3+ billion Decommissioning Trust Fund is used up by Holtec, NY taxpayers may be left with any remaining costs. Holtec has said they will be responsible for any shortfall. Given their shady business reputation, can they be trusted?

NRC Oversight

The NRC is an agency captured by the industry it is supposed to regulate. This explains why it has historically been lax, often at the expense of public health and safety. NRC has already made allowance to Holtec that could have severe consequences by approving Centralized Interim Storage in New Mexico. It is entirely possible that this so-called temporary storage could become permanent. Should a permanent repository be found, it would mean moving the waste twice, a terrible idea. Careful monitoring on site is the only solution we have at the current time.

The NRC needs to put people before industry profit and plan for worst case scenarios.