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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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Submitter Information

Name: Martha Upton

Address:

Garrison, NY, 10524

Email: marthaupton76@gmail.com

General Comment

My name is Martha Upton and I live in Garrison, NY, less than ten miles from the Indian Point facility. I am deeply concerned about Holtec's plans for decommissioning the power plant. Their plan inadequately addresses crucial safety issues, and this has ramifications for the entire NY metropolitan area. First, 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. Next, visual inspection of canisters is not adequate. There are no pressure monitors or relief values 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. In addition, 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. Finally, 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. 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. Taken all together, the plan is dangerously underdeveloped and simply unacceptable. The situation cries out for NRC intervention, as this is literally a disaster waiting to happen. I ask that you reject this plan and insist upon a PSDAR that demonstrates the highest professional standards and best practices in handling this extremely complex and dangerous undertaking. Anything less is a complete disservice to the citizens of this vulnerable, highly populated region.

