

February 26, 2021

Hon. Michelle L. Phillips, Secretary, and Commissioners, New York State Public Service Commission

Re: Matter Master: Matter Master: 19-02636/19-E-0730: Joint Petition by Entergy Nuclear Indian Point 2, LLC; Entergy Nuclear Indian Point 3, LLC; and Nuclear Asset Management Company, LLC regarding the Proposed Transfers of Indian Points Licenses

We feel that Indian Point is the great albatross around our collective neck and Holtec is ill equipped to take on a matter so paramount. There are other companies available to take on the decommissioning process. Companies without the history of malfeasance that Holtec is plagued with. There are other options. Energy Solutions and Orano and two other such choices. We implore this commission to use its authority to choose a better path.

At this moment, we need to decommission a nuclear plant. With it, is the potential to do unnecessary harm to the New York Metropolitan Area and its 18.5 million inhabitants.

It should be noted for the record that Holtec has never completed a decommissioning project. Their current model of “fleet decommissioning” is just starting. Its first undertaking is Oyster Creek, which it acquired in July 2019, and its entire nuclear “fleet” was acquired less than a year ago. While Holtec has never completed the decommissioning of a nuclear plant before, they have a history of [mishandling nuclear waste](#) and [hiding safety violations](#). In March 2019, the NRC recommended that Holtec be fined 116 thousand dollars for nearly dropping a canister loaded with nuclear waste down 18 feet.

They failed to mention any of the issues they'd faced with waste storage to the public when meeting with the village of Buchanan.

The rate-payers have endowed the decommissioning trust fund to be used so that decommissioning would be done in safety and austerity. Holtec has a record of adhering to neither.

We would like to wrap up decommissioning quickly and pretend we can make the site suitable for a park by the 2030's. But this is simply not the reality we live in. There are those who are acting as though the same quality work will result regardless of how long it takes or who does it.

There is no way to safely transport the spent fuel and there is nowhere to send it. If we put this radioactive fuel on the roads, on the rails, or on the rivers, then every community that it passes

through will be at risk. Without a realistic transportation plan and no place to put it, then the fuel will be remaining on site indefinitely. Holtec does not have a plan to handle this.

New Yorkers should not be left responsible for the cleanup of Indian Point if Holtec's precarious scheme fails. If they run out of money before decommissioning is finished, then it'll be the public who has to turn out their pockets.

The Decommissioning Oversight Board(DOB) is a vital component of the decommissioning process. The DOB legislation would encourage a safe and transparent decommissioning. We implore the PSC convene a meeting of the DOB before any license transfer is finalized.

This is the critical issue of the Hudson Valley for the next half century or more. Let us look back and know that we did all we could to maximize safety, and minimize regret. Given their lack of experience, lack of plan, and general incompetence, we believe this commission should deny the license transfer. This is decommissioning a nuclear power plant, there are no second chances.

Sincerely,

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