

Letter to NDCAP Committee January 15, 2020

This country and American business are going through soul searching around two crashes of the Boeing 737 Max. A respected company, almost an American institution of excellence, became focused on marketing and profit rather than on safety of their product. They actually suppressed internal warnings and concerns about the safety of their aircraft. In addition, they intentionally misled and manipulated the federal oversight agency, the FAA. Safety, common sense, and honesty were compromised. 346 people died because of it. Boeing has lost a reputation and billions of dollars.

My wife and I read the PSDAR report. We were both struck by the excruciatingly detailed cost charts where phases and cost items were tracked by activity and durations across years, down to the last dollar. There are many pages of those charts. In marked contrast, there are only a few pages on the risk evaluation process on pages 93-95. Holtec talks evaluation process but generically only, and not about actual risks. Radiological dangers, which are of most importance to the community, are only addressed in a short dismissive paragraph on Page 31. Holtec seems content with thinking and saying that defueling lowers the likelihood of a radiological release along with unspecified procedures to minimize releases. They even used the plural, releases. Perhaps an expectation unwittingly made. No release is acceptable and all efforts are needed to avoid one. Accidents and damage are not prevented by a GEIS document. The discussion of possible accidents in this entire document by Holtec is very minimal. Instead the document falls back on the referencing of the NRC GEIS as if that document lowers concern. In fact, if you read Section 4.3.9.2 of NUREG-0586 Supplement 1, it says that decommissioning **increases** the risk of accident since activity is significantly increased, raising accident potential above usual normal plant operations. It does not lower it as this PSDAR suggests. As two people living within ten miles of Indian Point, this is completely unacceptable and alarming. It does not inspire confidence in the company or the plan. It appears that safety and contingency planning are glossed over, considered as just added cost percentages and possible schedule delays.

The best way to avoid accidents is to first consider all of the possibilities for them up front. You identify them and discuss them. You also consult with NRC and deliberate with local first responders and the community representatives and public. You spend the time, and the money, to determine what could or might happen. You develop plans and means to avoid accidents happening. In so doing you identify adequate responses and approaches in case a problem actually takes place, way ahead of any event. You can base training needs on this. Then you can then fold this into the larger plan and costs. The responses and the associated resources, people, checklists, equipment, time and money become part of the work, the costs, the timeline, and the plan. This level of detail is not in the PSDAR.

Unfortunately this PSDAR reads like a sales proposal. The emphasis is clearly on Holtec, not on the safety of the community. This is not only insensitive, it shows a disregard that is upsetting. It shows a lack of concern and regard for the very real element of the potential risks. That jeopardizes both the community and a successful decommissioning.

This NDCAP entity, as a first order of business, should request from Holtec a thorough delineation of potential accident scenarios from the decommissioning. The risks to the public and site workers of the scenarios should be documented. Holtec should prepare methods of avoidance, notification, emergency response and mitigation response documents to deal with the potential scenarios. It should share these with the NDCAP.

We are dealing with possible impacts to the health and lives of thousands of men, women, and children living around this site. Those impacts are significantly more important and lasting than Holtec costs and profits. Human errors happen. People misunderstand. Equipment breaks. Multiple problems happen at the same time. Delays cause stress. Flawless execution is a presumptuous potentially deadly assumption. Any plan and its costs must explore, face, and prepare for the unexpected.

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