

February 23, 2021



Public Watchdogs

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John B. Rhodes, Chair
New York State Public Services Commission
Empire State Plaza
Agency Building 3
Albany New York, 12223-1350

Via electronic submission and U.S. Mail

Re: Matter No. 19-02636, Case No. 19-E-0730, Joint Petition of Entergy Nuclear Indian Point 2, et al

Dear Commissioner Rhodes:

I am writing to warn you of the dangerous consequences of approving the joint application to transfer the Indian Point license from Entergy to Holtec. As you may be aware, Holtec and its affiliated Limited Liability Corporations have an established track record of bribery. What's more, Holtec is reported to be the subject of a criminal investigation in New Jersey.

What you may not know is the extent of Holtec's efforts to limit its liability with shell companies.

The second page of this letter documents more than 30 separate Holtec corporations in Delaware, Florida, and New Jersey. The purpose of these entities is to prevent financial losses to the owner, Krishna Singh.

An accident or terror attack at Indian Point could affect the health of millions. In the case of Fukushima, TEPCO, claimed the disaster site to be *bona vacantia*, a legal term meaning "an ownerless property for whom no one is responsible."

That's exactly what Entergy is doing to New York State now:

Entergy is transferring ownership of nuclear waste with nuclear weapons potential to a private shell corporation for whom no one is responsible. Don't do it.

Sincerely,

Charles Langley
Executive Director, Public Watchdogs

P.S. The "spent nuclear fuel" at Indian Point will remain hot and deadly for 250,000 years¹, yet Holtec's canister warranty is for only 25 years.²

¹ See Scientific American, 01-28-2009, Spent Nuclear Fuel: A Trash Heap Deadly for 250,000 Years at <https://bit.ly/37GQZFM>

² See Holtec warranty at <https://bit.ly/3uqQI3y>

Partial list of Holtec entities in New Jersey, Delaware, and Florida

(only companies named Holtec are included in this list. Holtec has other affiliates under other names)

	Holtec Company Name	ID Number	City	Type	State
1	HOLTEC DECOMMISSIONING INTERNATIONAL, LLC	43634	Camden	FLC	NJ
2	HOLTEC GOVERNMENT SERVICES, LLC	40977	Camden	FLC	NJ
3	HOLTEC INTERNATIONAL CORPORATION	38782	CAMDEN	FR	NJ
4	HOLTEC INTERNATIONAL POWER DIVISION, INC.	38653	Camden	FR	NJ
5	HOLTEC INTERNATIONAL TECHNICAL SERVICES INC.	38779	MARLTON	FR	NJ
6	HOLTEC INTERNATIONAL, A NEW JERSEY CORPORATION	31742	MARLTON	DP	NJ
7	HOLTEC LOGISTICS LLC	43800	JUPITER	FLC	NJ
8	HOLTEC POWER PLANT COMPONENTS DIVISION, INC.	39458	Camden	FR	NJ
9	HOLTEC TECHNOLOGY CENTER LLC	42010	JUPITER	FLC	NJ
10	HOLTEC DECOMMISSIONING INTERNATIONAL, LLC	6874264	Wilmington	LLC	DE
11	HOLTEC DISC, INC.	4427214	Wilmington	Corp	DE
12	HOLTEC ENGINEERED ALUMINUM SYSTEMS DIVISION, LLC	4625788	Wilmington	LLC	DE
13	HOL-TEC ENTERPRISES, INC.	3566711	Wilmington	Corp	DE
14	HOLTEC ESERVICES, INC.	3420236	Wilmington	Corp	DE
15	HOLTEC GOVERNMENT SERVICES, LLC	5102302	Wilmington	LLC	DE
16	HOLTECH LTD.	925787	Wilmington	LTD	DE
17	HOLTEC INTERNATIONAL	4114084	Wilmington	Corp	DE
18	HOLTEC INTERNATIONAL DISC, INC.	7201627	Wilmington	Corp	DE
19	HOLTEC INTERNATIONAL POWER DIVISION, INC.	4051448	Wilmington	Corp	DE
20	HOLTEC INTERNATIONAL TECHNICAL SERVICES INC.	4114080	Wilmington	Corp	DE
21	HOLTEC, LLC	2011030	Georgetown	LLC	DE
22	HOLTEC LOGISTICS, LLC	7715178	Wilmington	Corp	DE
23	HOLTEC POWER, INC.	4977756	Wilmington	Corp	DE
24	HOLTEC POWER PLANT COMPONENTS DIVISION, INC.	4488157	Wilmington	Corp	DE
25	HOLTEC TECHNOLOGY CENTER, LLC	5408778	Wilmington	LLC	DE
26	HOLTEC GOVERNMENT SERVICES, LLC	M12000001360	Camden	FLLC	FL
27	HOLTECH/R&D, INC.	L78440	Lantana	Fla Profit Corp	FL
28	HOLTEC INTERNATIONAL, A NEW JERSEY Corp	F93000001212	Marlton	Foreign Profit Co	NJ-FL
29	HOLTEC (U.S.A.) CORPORATION	H63394	Plant City	FL Profit Corp	FL
30	HOLTEC USA SALES LLC	L01000000888	Plant City	LLC	FL
31	HOLTEC GOVERNMENT SERVICES, LLC	M12000001360	Camden	FLLC	FL