



May 7, 2020

Via Electronic Filing System

Hon. Michelle L. Phillips
Acting Secretary to the Commission
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, NY 12223-1350

Re: Comments on Case 19-E0730 Requesting the New York Public Service Commission to Exercise its Jurisdiction over the License Transfer and Decommissioning of Indian Point Energy Center and Deny the Proposed Transfer to Holtec as Not in The Public Interest

Dear Secretary Phillips:

Riverkeeper, Inc. (“Riverkeeper”) respectfully requests that the New York Public Service Commission (“the Commission”) exercise its jurisdiction and oversight over the proposed license transfer of the Indian Point Energy Center (“Indian Point”) from Entergy Nuclear Operations, Inc., Entergy Nuclear Indian Point 2, LLC, and Entergy Nuclear Indian Point 3 (collectively “Entergy” or “ENOI”) to three subsidiaries of Holtec International: Holtec Decommissioning International, LLC (“HDI”), Holtec Indian Point 2, and Holtec Indian Point 3 (collectively “Holtec”). Further, Commission should deny the transfer, as Holtec is unfit to hold the license for Indian Point in light of Holtec’s finances and history of bribes, lies, and risk-taking.¹ In addition, Holtec is under-capitalized, inexperienced at Decommissioning, over extended, and seeks to use a substantial portion of the ratepayer funds in the Trust Fund for purposes other than Decommissioning. Furthermore, Holtec proposes to do no effective site restoration, leaving the radioactive groundwater under the site to pollute the Hudson River and limit the uses of the site. For all, of these reasons, the Commission should deny the application.

Riverkeeper is a member supported 501(c)(3) non-profit organization whose mission includes safeguarding the environmental, recreational and commercial integrity of the Hudson River and its ecosystem, as well as the watersheds that provide New York City with its drinking water. Riverkeeper has been engaged in various forms of advocacy around Indian Point for decades, and is the only non-profit party to the 2017 Indian Point Closure Agreement with Entergy and the State of New York. In the parallel federal license transfer proceeding at the Nuclear Regulatory Commission, Riverkeeper has submitted a Request for a Hearing and Leave

¹ See Riverkeeper’s petition which garnered over 1,500 signatures showing the ratepayers’ concerns over Holtec’s fitness as transferee. *Stop Holtic’s Lies, Bribes, and Risk-taking*, Riverkeeper, https://secure.riverkeeper.org/site/SPageServer?pagename=Indian_Point_Petition&_ga=2.217321046.1703948222.1572284587-488044215.1560520550 (last visited May 7, 2020) (Attachment 1).

to Intervene (Docket Nos. 50-3, 50-247, 50-286, 72-051) on February 12, 2020 and comments regarding the proposed transfer on March 25, 2020.

I. Background

On November 21, 2019, Entergy and Holtec subsidiaries (jointly the “Applicants”) submitted a joint petition to the Commission for a declaratory ruling disclaiming jurisdiction from the review of the proposed transfers or, in the alternative, an order approving the proposed transfers pursuant to Section 70 of the New York Public Service Law (“Joint Petition”).² In their petition, a two-part transaction is proposed consisting of (1) a series of internal transfers to consolidate all Indian Point assets and liabilities within Entergy into Merchant Properties LLC (“Internal Transfers”), and then (2) acquisition of all membership interests in Merchant Properties LLC by a Holtec subsidiary (“Holtec Transaction”). These transactions are targeted to occur in May 2021, shortly after all three reactors at Indian Point are retired. In short if the proposed transfers are completed, Holtec will ultimately own all Indian Point assets and become the holder of its licenses.

In addition, on December 19, 2019, Holtec—through its subsidiary Holtec Decommissioning International, LLC—submitted a Post Shutdown Decommissioning Activities Report (“PSDAR”) for Indian Point to the U.S. Nuclear Regulatory Commission (“NRC”) and the Commission.³ The PSDAR outlines Holtec’s plan for decommissioning after the transfers are approved.

On January 17, 2020, the Commission issued a notice seeking public comments regarding “whether the petition should be granted in whole or in part, whether any conditions should accompany a grant of the Petition in whole or in part, and whether the Commission should take any other action related to the Petition or the Petitioners.”⁴ In particular, the Commission seeks comment on the following questions:

- (a) Whether the Transfers should be reviewed pursuant to PSL Section 70;
- (b) whether the three-pronged test described in the Petition is the appropriate standard for reviewing the Transfers pursuant to PSL Section 70; and,
- (c) whether the Transfers should be approved pursuant to PSL Section 70, including whether the Transfers are in the public interest.⁵

² Joint Petition of Entergy Nuclear Indian Point 2, LLC; Entergy Nuclear Indian Point 3, LLC; and Nuclear Asset Management Company, LLC for a Declaratory Ruling Disclaiming Jurisdiction Over or Abstaining from Review of the Proposed Transfers or, in the Alternative, an Order Approving the Proposed Transfers Pursuant to Section 70 of the New York Public Service Law, NY PSC Case No. 19-E-0730 [Nov. 21, 2019] (*hereinafter* Joint Petition).

³ Letter from Andrea L. Sterdis, HDI, to U.S. NRC, re: Post Shutdown Decommissioning Activities Report including Site-Specific Decommissioning Cost Estimate for Indian Point Nuclear Generating Units 1, 2, and 3, (Dec. 19, 2019) (ADAMS Accession No. ML19354A698), see 85 Fed. Reg. at 3,948 (“PSDAR”).

⁴ Notice Seeking Comments, *Entergy Nuclear Indian Point 2, LLC; Entergy Nuclear Indian Point 3, LLC; and Nuclear Asset Management Company, LLC for a Declaratory Ruling Disclaiming Jurisdiction Over or Abstaining from Review of the Proposed Transfers or, in the Alternative, an Order Approving the Proposed Transfers Pursuant to Section 70 of the New York Public Service Law*, at 5, NY PSC Case No. 19-E-0730 [January 17, 2020].

⁵ *Id.*

Below, Riverkeeper will show that the Commission has jurisdiction to review the proposed transfers based on its own precedent. Further, the two-part transaction should be reviewed as a whole such that it should be reviewed under Section 70 due to the intra-corporate aspect of the transfers and the high potential for impacts to the public interest. Riverkeeper does agree that the appropriate standard for reviewing the transfer under Section 70 is the three-prong test that considers whether: “(i) the transferee has the potential to exercise market power following the transaction, (ii) the transferee is financially sound, and (iii) the transferee is capable of safely operating the facilities.”⁶ However, both Holtec’s past actions and its Indian Point decommissioning plan throw into question its financial and technical capability and reveal that the transfer presents a significant risk to the public interest. Therefore, the proposed transfer fails to fulfill the second and third elements of the three-prong test and must be rejected.

II. Jurisdiction and Standard of Review

A. The Commission’s Jurisdiction over Indian Point is Not Federally Preempted and is Within its State Delegated Powers

As a threshold matter, New York State – through the Commission – can exert jurisdiction over issues arising throughout the entire lifecycle of nuclear power plants, including the decommissioning process.

Recognizing that there is split federal and state jurisdiction over nuclear power plants, it is clear that the federal jurisdiction *does not* preempt or cover all decommissioning related matters.⁷ While it is undisputed that federal law preempts the entire field of nuclear safety, including regulation of all radioactive materials and their disposal, the courts have maintained that States retain control of other aspects – such as economic oversight, land use, non-radiological contamination.⁸ As the courts have noted, this distribution of roles is preserved regardless of the closure of nuclear facilities,⁹ thus the early termination of state jurisdiction would lead to a highly problematic regulatory gap contrary to legislative intent.¹⁰ Indeed, the PSC has previously exercised jurisdiction over a prior proposed transfer of Indian Point and rejected it, without any claim of pre-emption being asserted by Entergy.¹¹

⁶ Joint Petition at 40.

⁷ *Pac. Gas & Elec. Co. v. State Energy Res. Conservation & Dev. Comm’n*, 461 U.S. 190, 194, 205 (1983) (discussing state and federal division of authority over regulation of nuclear power).

⁸ *Id.* at 211 (“States exercise their traditional authority over the need for additional generating capacity, the type of generating facilities to be licensed, land use, ratemaking, and the like.”); *Missouri v. Westinghouse Elec., LLC*, 487 F. Supp. 2d 1076, 1086 (E.D. Missouri 2007) (“There is no dispute that Missouri retains jurisdiction over the non-radiological components of mixed wastes”...provided the state does not infringe or conflict with NRC’s regulation of radioactive components).

⁹ See discussion in *Westinghouse Elec., LLC*, 487 F. Supp. 2d at 1087 (“the courts have made no distinction between the NRC’s exclusive jurisdiction over nuclear safety at a [sic] operating facility versus its jurisdiction at a decommissioned one”).

¹⁰ *Pac. Gas & Elec. Co.*, 461 U.S. at 207-08 (stating that “it is almost inconceivable that Congress would have left a regulatory vacuum” and inferring that states retained authority over utility financial qualifications)

¹¹ *Indian Point*, Order Closing Proceeding and Instituting New Proceeding, at 5, NY PSC Case No. 08-E-0077/10-E-0402 [Aug, 19, 2010] (reaffirming finding in Order Establishing Further Procedures issued May 23, 2008 (Initial Order)) (hereinafter *Enexus*)

Of the state agencies, the Commission is in the best possible position to fill this regulatory gap with regard to finances and therefore must retain their role within the decommissioning process. The Commission must maintain jurisdiction over the transfers and throughout the decommissioning process to provide critical oversight of the economic impacts that may be present on the site, and work with other state agencies—such as the Department of Environmental Conservation—to protect the State’s interests.

B. The Commission Must Exercise Jurisdiction Over the Transfers and Indian Point Post-Retirement

Entergy and Holtec must seek the Commission’s approval to transfer the license for Indian Point and its related assets because the Commission has previously held that “nuclear facilities have a greater impact on the public interest than hydro and fossil facilities.”¹² The Commission’s approval must be sought even if all three Indian Point Units are permanently retired prior to Indian Point’s transfer. Precedent shows the Commission has general jurisdiction to approve or deny license transfers, as previously exercised at Indian Point¹³ and Danskammer¹⁴ power plants. As the Commission previously recognized, it may examine all facts and circumstances surrounding a retirement and extend its jurisdiction in situations where it appears the applicants are using a retirement to avoid the Commission’s jurisdiction.¹⁵

The Commission has previously retained jurisdiction over decommissioned power plants until all rate-related issues are resolved.¹⁶ Impacts on rates may still linger after the retirement regardless of how the facility generated energy. The likelihood of these impacts is increased due to the complexity and duration of nuclear decommissioning in particular, as compared to other sources of energy generation.¹⁷ By itself, the uncertainty surrounding spent fuel management and the potential need for perpetual maintenance of fuel storage would justify increasing the Commission’s oversight of Indian Point. Such expansion of the Commission’s review would not be a departure from prior precedent where the Commission found the public interest impact of nuclear plants required additional review of license transfer in contrast to hydro and fossil fuel plants.¹⁸ As such, the Commission must exercise the post-closure jurisdiction over nuclear facilities, including Indian Point.

Distinguishing the Commission’s decision in *Danskammer*, there it was found that once the operations ceased at that site there was no potential for adverse impacts to the public

¹² *Enexus*.

¹³ *Indian Point*, Order Closing Proceeding and Instituting New Proceeding, NY PSC Case No. 08-E-0077/10-E-0402 [June 28, 2008].

¹⁴ *Dynegy Danskammer LLC*, Order Approving Transfer and Authorizing a Retirement Prior to Expiration of the Notice Period, NY PSC Case No. 13-E-0019/0012 [April 22, 2013] (Hereinafter *Danskammer*).

¹⁵ *Id.* at 12.

¹⁶ *Danskammer*, at 13 n. 12 (“For utilities subject to full ratemaking jurisdiction, that jurisdiction continues notwithstanding a plant retirement, until all ratemaking issues are resolved upon final disposition of the retired plant”).

¹⁷ *See Enexus at 5*.

¹⁸ *Id.*

interest.¹⁹ Irrespective of whether that assumption was correct in *Danskammer*, here, the closure of Indian Point *does not* eliminate the potential for adverse impacts on ratepayers. Unlike other types of power plants, retired nuclear power plants draw upon decades of ratepayer funds in decommissioning funds throughout the decommissioning process. In addition, extensive operational work funded by ratepayers, such as spent fuel management, will occur after the transfer. Therefore, to safeguard ratepayers interests, the Commission must have continuing jurisdiction over the transfer and beyond.

Furthermore, the extension of the Commission’s jurisdiction to include activities during the decommissioning process falls well within the powers delegated by the New York legislature. A tenet of administrative law is that Legislature’s grants of power should be interpreted broadly to provide agencies with the flexibility needed to fulfill the legislative intent. The courts have recognized this is especially applicable to the power industry with its many nuances.²⁰ While the Public Service Law does not explicitly include decommissioning of nuclear plants, it is easily foreseeable that the agency that authorizes the creation and regulates the operation of a facility would also be involved in the closure of the same facility in so far as it may relate to the ratepayer’s finances. It is within the objective and purpose of the law—“to prevent the customers from abuses”—that the agency ensures the funds collected from the customers are used for the purpose intended, to completely decommission Indian Point.²¹ As such, reviewing the transfer of the license and approval of a trustworthy entity to complete the decommissioning and oversee the use of the fund is a critical task to fulfill the Commission’s mission and is well within its legislative grant of authority.

In addition, under the same reasoning, Riverkeeper asks the Commission to continue monitoring of the financial situation at Indian Point after the transfer is completed. This is critical since history has shown that the NRC’s oversight does not adequately address and examine decommissioning finances. Most recently, the state of Massachusetts has brought suit against the NRC for its repeated “rubber stamp” approvals for the transfer of the Pilgrim power plant from Entergy to Holtec.²²

Here, as illustrated by the signatories to Riverkeeper’s petition, the ratepayers have significant concerns about Holtec and both its technical and financial management.²³ As matter of public policy and to advance its mission, the Commission should retain oversight over the transfer and throughout the entire decommissioning process.

C. The Transfer must be Reviewed as a Whole, and Not Segmented into a “Two Part Transaction”

¹⁹ *Danskammer*, at 14.

²⁰ *Citizens for Orderly Energy Policy, Inc. v. Cuomo*, 78 N.Y.2d 398, 410 (NY Ct. App. 1991).

²¹ *Joint Petition of Corning Natural Gas Corporation and the Article 6 Marital Trust Under the First Amended and Restated Jerry Zucker Revocable Trust dated April 2, 2007 for Declaratory Ruling or, in the Alternative, Approval, Pursuant to Section 70 Public Service Law, of Stock Acquisition*, 2013 N.Y. PUC LEXIS 369, *7 (Sept. 19, 2013).

²² Colin A. Young, *Mass. AG Maura Healey Sues NRC Over Pilgrim Nuclear Power License Transfer*, WBUR (Sept. 27, 2019), <https://www.wbur.org/earthwhile/2019/09/27/maura-healey-pilgrim-nuclear-lawsuit>.

²³ *Supra*, n. 1.

The Commission should examine the two part transaction as a whole, rather than segmenting the jurisdictional analysis between the Internal Transfers and Holtec Transaction. It is clear from the Applicants' filing that the sole purpose of the Internal Transfers is to facilitate the Holtec Transaction, and neither transaction would occur in the absence of the other. The Commission's precedent shows that it has previously exercised jurisdiction over future transfers.²⁴

As illustrated in *Exelon Generation Co., LLC*, the Commission had assessed a proposed eight part intra-corporate restructuring in light of the potential introduction of a new third-party ownership interest in the future.²⁵ There, the Commission concluded that all potential third-party entities must be identified before it could rule on the proposed restructuring, such that it can properly review the transaction.²⁶

The application attempts to evade the Commission's review of the license transfer through the segmentation of transfer into two separate transactions. Entergy and Holtec have also carefully structured the timing of the Holtec transaction to occur immediately after the retirement and defueling of the plant, at which they allege the Commission's jurisdiction ceases. The convenience of this timing strongly suggests that entire transfer is intentionally structured to bypass the Commission's jurisdiction.

As described, the entire purpose of Entergy's internal consolidation is to facilitate the ultimate transfer of Indian Point to Holtec and is as necessary prerequisite to the proposed Holtec Transaction. Thus, any eventual impact to the public interest due to the change in ownership should also be attributed to the internal consolidation that sets up the foundation for the transfer, even if the internal consolidation alone does not present any risks.

If the entire transfer is viewed as a whole, then the transfer will partially occur during the operation of Indian Point—when it is clearly an energy plant subject to the Commission's jurisdiction under Section 70.

D. Indian Point Remains an "Energy Plant" Notwithstanding its Retirement Status

Alternatively if the transfer is not considered as a whole, the Commission has the discretion to determine when a facility is an "energy plant" subject to their jurisdiction under the Public Service Law and Commission precedent. This determination of jurisdiction is not only limited whether the facility has been "retired," but can extend beyond official retirement as needed to protect the public interest and rate payers.

As discussed above, the Commission has retained jurisdiction over other retired power plants until all potential rate-making issues have been resolved. Likewise, in *Danskammer*, the

²⁴ *Petition of Exelon Generation Company, LLC for a Limited Declaratory Ruling that Intra-Corporate Restructurings Require No Further Review Under Section 70 of the Public Service Law*, 2017 N.Y. PUC LEXIS 430 (August 03, 2017).

²⁵ *Petition of Exelon Generation Company, LLC for a Limited Declaratory Ruling that Intra-Corporate Restructurings Require No Further Review Under Section 70 of the Public Service Law*, 2017 N.Y. PUC LEXIS 430, August 03, 2017, Issued and Effective, CASE 17-M-0302.

²⁶ *Exelon*, 2017 N.Y. PUC LEXIS, at *5.

Commission noted that in situations where it finds the applicant has attempted to evade review of a transfer, it may continue to exercise jurisdiction over a retired plant to protect the public interest.²⁷

In the instant transfer, the ratepayers may still be subject to significant impacts if the licensee does not prudently manage the decommissioning spending. In addition, the unique and complex circumstances surrounding nuclear power plants substantively differ from the cases cited within the Joint Application that deal with non-nuclear facilities. Not only is the decommissioning of a nuclear facility often more lengthy and costly than other types of plants, but also operations related to spent fuel must be properly managed for an indefinite period of time after the cessation of power generation. The Commission itself has recognized that nuclear facilities require more review than other types of facilities due to its complex nature.

E. The Transfer is Subject to Section 70 Review

The Joint Application recognizes that the Commission may forego the Section 70 analysis for certain intra-corporate and upstream transfers only if 1) there are no rate impacts, or 2) if there are no impacts to the public interest. As shown below, the expense of decommissioning creates a risk of future rate impacts and may negatively affect the public interest. The Commission has previously recognized that nuclear power plants in particular present a heightened risk to ratepayers such that the exception for upstream transfers—the Wallkill presumption—does not apply and review of the transfer is necessary and appropriate.²⁸ The same reasoning should apply to the exception for intra-corporate transfers, which uses the same standard. Thus, the entire proposed transfer must be reviewed by the Commission under Section 70.

The appropriate standard for Section 70 review is the three-prong test as described in the Joint Petition: “(i) the transferee has the potential to exercise market power following the transaction, (ii) the transferee is financially sound, and (iii) the transferee is capable of safely operating the facilities.”²⁹ As shown below, Holtec fails two of three prongs due to its financial uncertainty and lack of technical experience. Therefore, the Commission must deny the proposed transfer due to its impact to the public interest.

III. Holtec’s Past Actions Reveal a Real and Unacceptable Risk to Ratepayers

The decommissioning fund consists of years of contributions from ratepayers intended to cover the entire cost of decommissioning the facility.³⁰ With the transfer of Indian Point, Holtec would gain access to over \$2 billion dollars of the public’s money in the decommissioning fund.³¹ The public has an intrinsic interest in ensuring their funds are not siphoned away from the original decommissioning purpose to unjustly enrich a private corporation.

²⁷ *Danskammer* at 14.

²⁸ *Enexus* at 5-6.

²⁹ Joint Petition at 40.

³⁰ *Citizens Oversight Board*, Indian Point Safe Energy Coalition (Feb. 23, 2019, 3:55 PM), <https://www.ipsecinfo.org/2019/02/23/cob-legislation-terms/>.

³¹ PSDAR at 100-104, tbl 5-1a-c.

In addition, if there is a shortage of decommissioning funds due to mismanagement or otherwise, the burden of making up the deficit will likely fall on the ratepayers.³² Therefore, the Commission and ratepayers have a substantial interest in who holds the decommissioning fund and the fund's management throughout the decommissioning process. As described below, Holtec's past bad actions, corporate structure, and lack of experience factor create an unacceptable risk of negative impacts to the ratepayer and local communities. Therefore, Holtec is unable to satisfy the Section 70 inquiry and the Commission's exercise of jurisdiction to deny the transfer is necessary to protect the public interest.

A. Holtec's History of Bad Action and Unfitness

The Commission must examine the transfer with the utmost scrutiny in light of Holtec's history of lies, bribes, and risk taking. Holtec's past actions throw into question its claims of financial stability, promises of local job retention, and its overall financial management. If Holtec were to engage in similar behavior at Indian Point, it would have severe financial repercussions to the public. It is Riverkeeper's position that this history creates a strong presumption that Holtec is unfit to take possession of Indian Point and we urge the Commission to deny the license transfer to Holtec; or at the very least, demand financial assurances and enforceable commitments as a necessary condition to transfer approval.

Holtec has displayed a willingness to exaggerate its financial status through the fabrication of nonexistent funding. On its application for tax breaks in New Jersey, Holtec sought to increase its desirability by citing favorable tax packages offered by other states.³³ It was later revealed that these alleged tax packages did not exist.³⁴ In light of this, the Commission must carefully examine the veracity of all Holtec's financial claims, especially since shortfalls in funding may derail decommissioning activities.

Further, Holtec has made numerous statements regarding the retention of the current Indian Point workforce,³⁵ but repeatedly failed to deliver on its employment promises for previous projects. This is of critical importance to the communities directly surrounding Indian Point as the town of Cortland is facing a loss of over \$32 million of revenue and elimination of a major employer.³⁶ Most saliently, unions have already raised concerns over Holtec's use of low skill workers for Oyster Creek in New Jersey, a similar nuclear decommissioning project that

³² Christopher Maag, *Investors See Huge Profits from Old Nuclear Plants, but It Could Cost Taxpayers*, North Jersey Record (June 20, 2019, 11:29 AM), <https://www.northjersey.com/story/news/watchdog/2019/06/19/nuclear-plant-decommissioning-holtec-other-firms-see-profit/1456809001/> (discussing how ratepayers were forced to cover the shortfalls of decommissioning funds in the past, up to half a billion dollars).

³³ Jeff Pillets, Nancy Solomon, and Alex Mierjeski, *A Huge Tax Break Went to a Politically Connected Company in New Jersey Despite Red Flags*, ProPublica (June 26, 2019, 5:00 AM), <https://www.propublica.org/article/a-huge-tax-break-went-to-a-politically-connected-company-in-new-jersey-despite-red-flags>.

³⁴ *Id.*

³⁵ Joint Petition at 6.

³⁶ *Indian Point Closure Update*, The Town of Cortland (July 8, 2019), <http://www.townofcortlandt.com/cn/news/index.cfm?NID=49205&jump2=0>.

Holtec only acquired in June 2019.³⁷ In addition, Holtec's lack of local job creation has led Ohio to rescind a \$475,000 tax credit granted to its subsidiary³⁸ and has brought criticism of its \$260 million tax package in New Jersey.³⁹ Therefore, the Commission should require Holtec enter into enforceable agreements regarding any employment related promises.

Finally, Holtec has been embroiled in numerous bribery, corruption, and perjury scandals, which casts a grim light on its ability to prudently manage over \$1.7 billion of the public's funds while maximizing its own profits. It also throws into doubt Holtec's willingness to provide truthful information to government officials and the public and its respect for the rule of law. Notably, Holtec was convicted of bribing a TVA official in order to secure a contract at the Browns Ferry Nuclear Plant, for which it was debarred from federal contracting for 60 days.⁴⁰ The evidence strongly indicates that Holtec's CEO, Krishna Singh, was personally involved in this transgression.⁴¹ Holtec subsequently lied about this debarment on its application for New Jersey tax credits, submitting that they affirmatively had not been disbarred from federal contracting.⁴² As a result, \$26M per year of tax breaks have been withheld, which Holtec asserts has left it "financially wounded."⁴³ Holtec was and still is associated with George E. Norcross, who is under investigation in New Jersey for misconduct related to the distribution of tax breaks under the EDA, including the one received by Holtec.⁴⁴

Moreover, Holtec has chosen to partner with SNC Lavalin, in creating Comprehensive Decommissioning International, the jointly held subsidiary which will act as the general contractor for the decommissioning process. On an even larger scale than Holtec, SNC Lavalin has been mired in numerous corruption and fraud scandals. SNC Lavalin pleaded guilty in Canada, paid a C\$280M fine for corruption linked to Libya and is currently barred from bidding on World Bank contracts due to its past offenses in Bangladesh and Cambodia.⁴⁵ These actions by both Holtec and SNC Lavalin reveals a culture that prioritizes maximization of profits at any expense and disregard for the law, a highly problematic focus when applied to public funds. Thus, the Commission must use the most critical eye to assess Holtec and the Indian Point transfer.

³⁷ Amanda Oglesby, *Unions: Oyster Creek Cuts Corners, Risks Safety by Hiring Cheap Labor*, Asbury Park Press (Sept. 24, 2019, 12:43 PM), <https://www.app.com/story/news/local/land-environment/2019/09/24/unions-oyster-creek-cuts-corners-risks-safety-hiring-cheap-labor/2379570001/>.

³⁸ Pillels *et al.*, *supra* note 17.

³⁹ Susan Schmidt, *Meet the Congressman Defending Questionable Tax Breaks for a Company Connected to His Rich Brother*, ProPublica (July 2, 2019, 5:00 AM), <https://www.propublica.org/article/meet-the-congressman-defending-questionable-tax-breaks-for-a-company-connected-to-his-rich-brother>.

⁴⁰ Ryan Hutchins and Katherine Landergan, *Holtec CEO was at Center of Inquiry that led to Disbarment by Federal Agency*, Politico (July 9, 2019 4:37 PM), <https://www.politico.com/states/new-jersey/story/2019/07/09/holtec-ceo-was-at-center-of-inquiry-that-led-to-disbarment-by-federal-agency-1091777>.

⁴¹ *Id.*

⁴² *Id.*

⁴³ <https://www.courierpostonline.com/story/news/2020/03/31/holtec-international-sues-new-jersey-economic-development-authority-tax-breaks-eda/5099479002/>

⁴⁴ Schmidt, *supra* note 22.

⁴⁵ *A Closer Look at SNC-Lavalin's Sometimes Murky Past*, CBC (Feb. 8, 2019, 1:00 PM), <https://www.cbc.ca/news/canada/snc-lavalin-corruption-fraud-bribery-libya-muhc-1.5010865> & <https://www.reuters.com/article/us-snc-lavalin-court/canadas-snc-lavalin-unit-pleads-guilty-to-fraud-charge-in-libya-case-idUSKBN1YM1V0>.

B. Holtec's Corporate Structure

The corporate structure of the Holtec in particular has significant implications on ratepayer liability and requires detailed review from the Commission to protect the public interest. First, the corporate parent is privately held, so its finances are totally opaque. All we know is that it has had a pattern of seeking government funding of various kinds and has recently asserted that it is “financially wounded.” This suggests that even the primary corporate entity may have limited financial resources. To add insult to that injury, the transaction is structured to shield the corporate parent from any liability through a web of LLCs. Even though much capital will flow to the parent, it would be extremely difficult to seek financial liabilities against the parent, unless the parent had previously agreed to financial assurances.⁴⁶ This allows the license holder to move profits into the assets of their corporate parent and then declare bankruptcy if decommissioning funds run out, leaving ratepayers on the hook for the remainder of the costs.

As proposed in the PSDAR, Holtec is bringing no capital whatsoever to the table. Instead, it intends to rely solely on the decommissioning trust as the only source of funding and asserts that no additional financial assurance is needed.⁴⁷ However, Holtec's own projections show that there is only a relatively small buffer of \$263 million, if the decommissioning runs over budget, therefore the trust alone is not adequate to ensure funding is available to complete to whole decommissioning process.⁴⁸ As discussed extensively by New York State in its contentions to the NRC this contingency is expected to be fully spent and is subject to numerous uncertainties.⁴⁹ These include, the lack of full site characterization, the vagueness of the PSDAR, Holtec's lack of experience and its use of the “fleet model,” and uncertainty regarding investment returns on the funds, all of which are discussed further below.

The Commission must ensure that any corporate entity that holds the Indian Point license has adequate assets to cover any shortfalls in the decommissioning fund, and condition the transfer on enforceable financial assurances as necessary.

C. Holtec's Lack of Experience

The risk to the ratepayers and public are exacerbated by the Holtec's inexperience and numerous uncertainties surrounding the projected cost of decommissioning Indian Point. Holtec claims that it will be able to complete the total cost of decommissioning and spent fuel management with the decommissioning fund.⁵⁰ Holtec also asserts its “fleet model” method of simultaneously decommissioning several sites will reduce costs.⁵¹ However, Holtec has never fully decommissioned a site, therefore Holtec's optimistic financial projections have never been

⁴⁶ Latham and Watkins, *Nuclear Decommissioning and Legal Risk* 11, Client Alert White Paper 2236 (2017) <https://www.lw.com/thoughtLeadership/nuclear-decommissioning-legal-risk>.

⁴⁷ See PSDAR at 106; Joint Petition at 46.

⁴⁸ PSDAR, at 100-104, tbl 5-1a-c.

⁴⁹ Petition of the State of New York for Leave to Intervene and for a Hearing (Feb. 12, 2020) (ADAMS Accession No. ML20043E118).

⁵⁰ Maag, *supra* note 13.

⁵¹ Letter from A. Christopher Bakken III, Entergy, to U.S. NRC, re: Application for Order Consenting to Transfers of Control of Licenses and Approving Conforming License Amendments, etc., 2 (Nov. 21, 2019) (ADAMS Accession No. ML19326B953) (“License Transfer Application”).

tested. The accuracy of these projections are further thrown into question by the Government Accountability Office's determination that NRC's formula for calculating decommissioning costs is outdated and consistently underestimates decommissioning costs.⁵² In the PSDAR, Holtec has projected a mere remainder of \$260 million in the decommissioning fund at the time of full site release.⁵³ While this may seem like a sizable buffer at first glance, there is actually little room for error since the cost estimate relies on an assumption that costs will not increase during the duration of decommissioning the unfounded assertion that the Department of Energy will accept the spent nuclear fuel by 2030.⁵⁴ In the event that these assumptions do not occur, it is foreseeable that costs may exceed the projected remainder in the fund, especially if especially if spent fuel management is extended indefinitely. Furthermore, the entire cost estimate is premised on Holtec's receipt of exemptions to use the trust funds for both spent fuel management and site restoration. Holtec has not articulated specific methods of funding these activities if the exemptions are not granted, adding yet another layer of risk due to uncertainty of funding.

Holtec's lack of expertise also raises questions regarding Holtec's technical and financial ability to account for unforeseen contamination or issues that often arise during decommissioning process. If a problem arises outside of Holtec's "expertise" in spent fuel management, its relative lack of experience may lead Holtec to run up additional costs in formulating a solution than another entity with more with decommissioning experience. In addition, Holtec's claim of expertise in spent fuel management is itself highly questionable, as shown by their gouged spent fuel casks at the San Onofre Nuclear Generating Station due to issues with Holtec's faulty engineering designs for their cask loading systems.⁵⁵

D. Holtec's Decommissioning Plan Follows Its Pattern of Bad Action

An examination of Holtec's Post Shutdown Decommissioning Activities Report ("PSDAR") shows that Holtec's pattern of bad action will likely continue at Indian Point. At the onset, Holtec's improper submission of the PSDAR to the NRC shows a disregard for the regulatory process. Federal regulations require that the licensee—at this time, Entergy—to submit the PSDAR; therefore, Holtec's submission is rendered invalid.⁵⁶ In addition, the substance of Holtec's PSDAR fails to fulfill any of the four primary purposes of PSDAR, as set

⁵² <https://www.gao.gov/assets/590/589923.pdf> (NRC formula is outdated, does not take risk analysis into account, and is based in part on unreliable "engineering judgements"); <https://www.powermag.com/nrcs-decommissioning-cost-formula-is-faulty-gao-report-says/>; <https://www.northjersey.com/story/news/watchdog/2019/06/19/nuclear-plant-decommissioning-holtec-other-firms-see-profit/1456809001/> ("the commission's own Office of Inspector General, as well as the Government Accountability Office and Pacific Northwest National Laboratory, together published four reports since 2011 finding the formula — created in the early 1980s — is so old that it consistently underestimates the amount of money needed.")

⁵³ See PSDAR, at 100-104, tbl 5-1a-c.

⁵⁴ For example, the Department of Energy has been pursuing a nuclear fuel repository in Yucca Mountain since 1987, a proposal that has been delayed, and abandoned at various times since. Michael Collins, *Congress Works to Revive Long-Delayed Plan to Store Nuclear Waste in Yucca Mountain*, USA Today (Jun. 3, 2018, 8:40PM) <https://www.usatoday.com/story/news/politics/2018/06/03/yucca-mountain-congress-works-revive-dormant-nuclear-waste-dump/664153002/>; PSDAR, at 97.

⁵⁵ Alison St John, *NRC Questions SoCal Edison Over Corrective Actions At San Onofre Power Plant*, KPBS (Jan. 25, 2019), <https://www.kpbs.org/news/2019/jan/25/nrc-questions-southern-california-edison-about-cor/>.

⁵⁶ 10 CFR 50.82(a)(4)(i).

forth by the NRC in Regulatory Guide 1.185.⁵⁷ The inadequacy of the PSDAR casts serious doubts on Holtec's ability to manage the decommissioning trust funds when it has demonstrated minimal effort in this preliminary planning stage. This letter will briefly summarize some of the flaws in Holtec's PSDAR.

The full discussion of deficiencies in Holtec's PSDAR may be found within Riverkeeper's March 25 comments to the NRC regarding the license transfer, and are incorporated herein.⁵⁸

1. The Cost-Estimate is Uncertain Due to the PSDAR's Vagueness

Of particular relevance to the Commission, the PSDAR does not satisfy the third PSDAR goal of "ensur[ing] that the licensee has considered all the costs of the planned decommissioning activities and has considered the funding for the decommissioning process" due to the lack of critical information and vagueness of the report.⁵⁹

For example, the PSDAR describes the pending site characterization and surveys of radiological and hazardous wastes, which will inventory the volume and location of these materials.⁶⁰ This knowledge is vital to the proper planning of the methods and costs for successfully handling these materials. Without the information provided by these foundational surveys, it is unclear how an accurate cost-estimate was determined. Similarly, the PSDAR mentions the possibility of barging large components for disposal, but does not provide any details of this proposal that would support a reliable cost-estimate—such as the frequency or route of the barges.⁶¹

2. The Cost-Estimate Relies on Unsupported Assumptions

The PSDAR cost-estimate also relies on a number of unsupported assumptions such as the transition of spent fuel to the Department of Energy ("DOE") by the year 2030.⁶² While the DOE is required by statute to take ownership of spent fuel, its plans are woefully undeveloped. The DOE still has not articulated how it will handle spent fuel and had abandoned its most promising proposal, a national radioactive waste repository at Yucca Mountain, in 2011 after three decades of consideration. After decades of failure, there is no evidence that the DOE will resolve the issue of spent fuel management and take ownership of the fuel by 2030.

⁵⁷ NRC, Standard Format and Content for Post-Shutdown Decommissioning Activities Report, Regulatory Guide 1.185 (Dec. 2012) (ADAMS Accession No. ML13140A038) ("Regulatory Guide 1.185"). The four main purposes are: (1) inform the public of the licensee's planned decommissioning activities, (2) assist in the scheduling of NRC resources necessary for the appropriate oversight activities, (3) ensure that the licensee has considered all the costs of the planned decommissioning activities and has considered the funding for the decommissioning process, and (4) ensure that the environmental impacts of the planned decommissioning activities are bounded by those considered in existing environmental impact statements. *Id.* at 5.

⁵⁸ Comment from Victoria Leung on the Indian Point Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments (NRC-2020-0021) (March 25, 2020) (ADAMS Accession No. ML20086K721) (hereinafter Riverkeeper, *NRC Comments*).

⁵⁹ Regulatory Guide 1.185 at 5.

⁶⁰ PSDAR at 55, 61.

⁶¹ *Id.* at 12, 20.

⁶² *Id.* at 48, 51.

Likewise, the PSDAR assumes that at a two percent growth rate the decommissioning trust funds will be sufficient to cover the entire cost of decommissioning, site restoration, and spent fuel management.⁶³ While Holtec's projected two percent growth rate is within NRC guidelines in 10 CFR 50.75(e)(1)(i), Holtec is not entitled to use the earnings account to pay for decommissioning.⁶⁴ Further, the recent COVID-19 crisis highlights the dangers of relying the fund's projected growth to meet all costs. The markets may be volatile, especially when faced with unexpected occurrences, such as a global pandemic. In the current uncertainty and damped markets, there are speculations that the United States will be plunged into a long recession. If that is the case, the predicted two percent growth rate may not be realized. While the economic effects of COVID-19 are uncertain at this point, it brings out the vulnerability of this assumption in the face of future emergencies and shows the need for a more solid financial guarantee.

3. Cost-Estimate Funnels Funds into Holtec's Own Pockets

Along with the unreliable cost-estimate, the PSDAR reveals Holtec's plan to maximize its own profits by funneling the decommissioning trust fund into its own pockets. Holtec's plan ultimately consists of owning and contracting decommissioning work to its own wholly and partially owned subsidiaries. Therefore, much of the \$2.3 billion estimated costs will eventually go into the coffers of the Holtec.⁶⁵ Because a substantial amount of its profits will be garnered from the decommissioning operations, Holtec is less dependent on finishing the decommissioning process properly to obtain a profit over the remainder of the decommissioning trust and there is little risk to Holtec regardless of whether decommissioning is completed.

In addition, Holtec's cost estimate relies heavily on the grant of exemptions to use over \$600M of the decommissioning trust funds for spent fuel management and site restoration, both non-decommissioning purposes.⁶⁶ This is problematic because it takes funds away from their original intended decommissioning purpose, makes a shortfall in the fund far more likely, and would provide a windfall profit to Holtec. Licensees are able to recoup spent fuel management costs from the Department of Energy. While Holtec does intend to seek reimbursement, it has made clear that it does not plan to return the reimbursed funds back into the trust.⁶⁷ As such, Holtec will be siphoning the trusts funds into other purposes, and then getting reimbursed for those costs, which it will pocket itself. The Commission should reject this raid on ratepayer funds, which would leave all risk with the public if the decommissioning trust fund subsequently falls short.

4. Necessary Groundwater Cleanup Is Unfunded

As discussed in Riverkeeper's March 25 comments to the NRC the PSDAR blithely assumes that no groundwater cleanup will be required despite numerous indications to the contrary.⁶⁸ In reality there are extensive plumes of radioactive groundwater under the site which are flowing to the Hudson River. There is no showing that this groundwater does not need to be

⁶³ See PSDAR at n. 3, Tbl. 5-1a 100.

⁶⁴ Petition of the State of New York for Leave to Intervene and for a Hearing 4-7 (Feb. 12, 2020) (ADAMS Accession No. ML20043E118).

⁶⁵ PSDAR at 49.

⁶⁶ PSDAR at 2. See 10 C.F.R. § 50.82(8)(i); 10 C.F.R. § 50.2.

⁶⁷ See PSDAR table 5-1a-c. 100-105.

⁶⁸ Riverkeeper, *NRC Comments* at 12-14.

cleaned up to meet New York State standards or even NRC standards. Indeed, it is likely that such cleanup will be needed because decommissioning will markedly change the hydrology of the site and those standards are tighter than NRC standards. Despite the massive uncertainty, no funds have been set aside to undertake this clean up. There is a strong danger that cleanup necessary to allow the site to be reused will not be done by Holtec and ratepayers will be left holding the tab.

IV. The Proposed Transaction is Against the Public Interest

As a result of all the problems outlined above, the proposed transaction is against the public interest because the applicant is unfit and the transaction as structured could lead to an incomplete decommissioning and no effective site resoration.

V. At Minimum, Financial Assurances are Necessary to Protect Ratepayers' Interests

Alternatively, if the Commission does approve the transfer, the Commission must require Entergy and Holtec to revise their PSDAR to reflect a comprehensive work plan and reliable cost estimate to the state prior to approval to ensure the financial stability of the transfer and protect the ratepayers' interests. The Commission has previously held that a "more searching inquiry" of license transfers is appropriate in light of the complexity of nuclear facilities.⁶⁹ The commission further recognized that transfers may affect the public interest and that "the owner of nuclear facilities must retain over the long term the access to financial resources adequate to support the de-commissioning of those facilities."⁷⁰

In light of the uncertainty surrounding the sufficiency of the fund and the decommissioning process, and the potentially significant impact on ratepayers, even if the Commission does not reject the transfer, Riverkeeper urges the Commission to demand financial assurances from Holtec to protect against contingencies if the transfer is approved. An example of such financial assurances can be seen in Entergy's recent transfer of the Vermont Yankee facility to NorthStar for decommissioning. In Vermont, the state was able to secure a number of financial assurances, including a commitment of \$140 million from NorthStar to the VY Station Decommissioning Trust Fund, and set milestones for certain non-nuclear aspects of site remediation.⁷¹ The Commission could draw upon the Vermont agreement as a model to promote the public interest.

In addition, the Commission should require that Holtec commit any and all funds recouped from the Department of Energy for spent fuel management expenses back into the decommissioning trust fund to ensure that Holtec will not be unjustly enriched by diverting trust fund monies towards non-decommissioning purposes. Further, the Commission should require Holtec to return any remaining decommissioning trust funds to the state, such that it may benefit the ratepayers.

⁶⁹ *Indian Point*, at 4.

⁷⁰ *Id.* at 5.

⁷¹ Vermont Yankee Settlement Agreement (Mar. 2, 2018), <https://www.nrc.gov/docs/ML1806/ML18066A044.pdf>.

VI. Conclusion

To close, Riverkeeper urges the Commission to deny the Joint Petition and use the utmost scrutiny to review the proposed license transfer of the Indian Point from Entergy to Holtec. Further, the Commission should not approve of the transfer to Holtec, as Holtec is an unfit steward of the public's funds. Alternatively, if the Commission does approve the transfer, it must secure adequate financial assurances from Holtec, especially in light of Holtec's history of bribes, lies, and risk-taking.⁷² Finally, the Commission should continue to monitor the economic situation throughout the decommissioning process.

We look forward to continuing to work with the Commission on the decommissioning of Indian Point.

Sincerely,



Richard Webster
Legal Director
Riverkeeper, Inc.

⁷² See Riverkeeper's petition which garnered 1,200 signatures (as of mid-October) showing the ratepayers' concerns over Holtec's fitness as transferee. *Stop Holtec's Lies, Bribes, and Risk-taking*, Riverkeeper, https://secure.riverkeeper.org/site/SPageServer?pagename=Indian_Point_Petition&_ga=2.217321046.1703948222.1572284587-488044215.1560520550 (last visited Oct. 28, 2019).

Attachments

Attachment 1: Signatures to Riverkeeper’s Indian Point Petition as of May 7, 2020

Petition: Stop Holtec's bribes, lies, and risk taking

Entergy has selected Holtec as the company to transfer Indian Point to for the purpose of decommissioning. With the transfer, Entergy would walk away from any liability, and Holtec would take over the \$2 billion trust fund, the management of the spent fuel, responsibility for security, and the decommissioning and site clean up. This is unacceptable because Holtec is the worst choice to entrust with these critical tasks. It has bribed workers at the Tennessee Valley Authority (TVA), was suspended from contracting with TVA, then lied about this to obtain tax breaks from New Jersey. In addition, its partner SNC-Lavalin is embroiled in a bribery scandal in Canada. To make things even worse Holtec has little experience with decommissioning and is not backing the project with any of its own money. Holtec’s spent fuel management system at San Onofre nuclear power plant proved to have serious design flaws, and there is a history of whistleblowers calling out Holtec for taking unreasonable risks with spent nuclear fuel canisters.

Tell Entergy and Governor Cuomo to halt Entergy’s transfer to Holtec. Demand that they select a company that is actually prepared to do the Indian Point decommissioning.

We the undersigned believe that Holtec is not a suitable company to undertake the decommissioning of Indian Point and take control of the \$2 billion trust fund because it has bribed its way into contracts, lied about the bribes, and has a history of risk taking in an area where safety is critical. Plus it has little experience with actual nuclear plant decommissioning and is not backing the project with any of its own money.

Freilich	Jeff
Keller	Elizabeth
Rosmarin	Amy
Ingraham	Cherie
Puca	Laurie
Weathers	Cliff
Sherber	Michael
Kantrowitz	Edie
Fletcher	Judith
Korn	Patricia
Knight	Elyse
Paula	Clair
Marcus	Jack David
Barouh	David
Tignanelli	Doreen
Rosen	Chris
Stein	Deborah
Koch	Peter
Bodane	Richard
Newton	Harry

Babiak	Katherine
Knaus	Lucinda
Metallo	Laura
Kessler	Bernard
Hogarth	Connie
Launois	Chris Pan
Vairo	Pasquale
Corbo	Andrew
Bomer	Jimmy
Balmer	Carole
Carroll	Patricia
Lippincott	John
Flowers	Bobbie
Vitale	Jeanne
Helpern	Elizabeth
Merjan	Barbara
Klessen	Helga
Wanshel	Jeff
Soroka-Dunn	Cynthia
Tiship	Victor

Gale	Ken
Channon	Dave
frank	gail
Small	Martin
Johnson	Sarah
Glaser	Dani
Dolan	Deborah
Sicular	Eve
Moderacki	Deidre
Stavis	Alex
Hemberger	Al
Fassman	dennis
Andersen	Cynthia
Costopoulos	Karen
Winslow	Kim
Dengler	Allegra
Moncada	Joanne
Mulder	James
Slavin	David
Malkin	Kenneth

Flavin	Stephen
Brennan	Ann
Ross	Sharon
Sheridan	Ian
Gaines	Nora
Osterberg	Nils
Connor	Janet
Brawer	Wendy
Leis	Valerie
Grimm	Carl
Piperato	Susan
DeCrosta	Richard
Ragucci	Maria
Huibregtse	Anne
Hughes	Michael
Bickel	George
Arroyo	Linda
Spencer	Jonathan
Blair	Jean
Segal	Elizabeth
Miller-Lyons	Judy
Schmitt	James
Bois	Julie
Kunzler	Philip
Lawrence	Glen
McBride	Kathleen
Jacob	Klaus
Hartel	Elaine
Alden	Diane
Rinzler	Melissa
Hamilton	Michele
Wish	Ron
Naples	Jean
Schulof	Robert
Horowitz	Muriel
Alexander	Jane
Bell	Jonathan
Brocius	Pamela
Herrera	Ariane
Hopkins	Stephen
Seaver	Carol
Viola	Philip
Young	Patricia

Aubry	Valerie
Bartow	Holly
Miner	Laura
Morales	Rich
Griffiths	Carole
Drucker	Beverly
Hamlin	Lucile
HIRSH	SETH
Mercado	Joni
Gottschalk	Steven
Davis	Samuel
Marxuach-Gusciora	Toby
Ennis	Diane
Risch	Elaine
Noll	Mary
Frater	Lara
Summers	Carolyn
Dutt	Anita
Sekaer	Christina
Apicella	Scott
Ottinger	Richard
Castaldo	Carmine
Yaroscak-Lanzotti	Helen
Lesko	Robert
Davis	James
Binder	Gene
Gribbin	Aileen
Riggs	George
Feher	Gwen
Heimbinder	Michael
Millar	Andrew
Seeman	Laurie
Newfield	Marcia
Lee	Michele
Glidden	Suzannah
Lettieri	Linda
Mattox	Janet
Silman	Jeffrey
Brancato	Deborah
Chambers	Gwendolyn
Gassman	Alan
Leibowitz	Arthur

Brown	Brian
Simone	Beverly
Goldfarb	David
Hodes	Harold
Alibrandi	Jill
Kirkland	Catherine
Silverman	Laura
Kane	Michael
Montgomery	Elizabeth
Temple	Michele
Chapman	Robert
Jacobson	Robert
Baldwin	Alec
Sissman	Norman
Montemoran o	Susan
Kleeger	Tim
Vuignier	Samantha
Van Keuren	Mary
D'Arco	Lawrence
Gagliardi	Maria
Freilich	Stanley
Spath	Kevin
Cuddy	Theresa
Lee	Irving
Pierson	Clare
Girardin	Josephine
Erts	Nancy
Friedrich	Pete
Stormer	Mary
Allee	Elizabeth
Thames	Susan
Schmidt	Paula
papandrea	JOHN
Pisha	Gale
Selden	Jane
Kooney	Rodney
Davidson	Margaret
Todd	Janis
Heller	Michael
Paoloni	Peggy
Brill	Marietta
Boutis	Lazarus
McEntee	Robert

Kepner	Ray
Periac	Jean Claude
Weisburd	Stana
Sullivan	Kathleen
Katzman	Annie
Bridgewater	Paul
Scialo	Thomas
Gonzalez	Sandi
Smock	Addie
DeStefano	Linda a.
Davis	Jane
Nager	Arnold
Elkman	Robin K.
Iachman	charles
Congdon	Dolores
Vose	Helen
Murchison	Ginny
Curran	Gerard
Brown	Marechal
Bare	Alan
Dean	Stewart
Kissam	Sandra
Harrison	Paige
Greene	Ajax
Farrell	Joshua
Walrod	Brad
Kassouf	Susan
Kardos	Theresa
Churchill	Christine
Mooney	Thomas
Solomon	Barbara
Hampel	Martin
Knauth	Robin
Blyth	Christopher
Hayt	Gregory
Arnold	Matthew
Huebner	Jerold
Wexler	Marly
Garcia	Armando A.
Chianis	Antonia
Pierson	Sheryl
Cornelia	Jared
Garvett	Esther

Bains	Jeffrey
Pelakh	Susan
Jurczewski	Carol
De Jasu	Barry
Laverdiere	Marc
Patrie	Lewis
Carey	Doris
KUCZENSKA	EWA
Gendvil	Derek
Mendelsohn	Cal
Jackson	Carol
Borrell	Geraldine
OConnor	Gerry
Lesser	Gerson
Shamah	Isaac
Levine	Joe
Tavares	George
Cali	Linda
Calabro	Louise
Duran	Janet
Haberman	Madelaine
Sikora	Margaret
Payne	Gail
Kalka	Paul
Goldsmith	Patricia
Bleifeld	Neil
Robinson	Silkie
Perry	Betty
Terrell	Walter
Bleckinger	Dana
Riley	Kelly
Modjeski	Jan
Hazelton	Judith
Frohn	Joyce
Gregg	Daria
Sucklal	Sirina
Harris	Barbara
Lebid	Enid
Teplin	Lynne
kalan	susan
Nielsen	Antonella
Lee	Steven
Schwab	Robert

Hennessy	Hugh
Garton	Katie
Keasbey	Edith
Kent	Diane
Patterson	Martina
Phillips	Donna-Lee
Falzone	Dominick
Reeves	Lenore
Neumann	Nancy
Wei	Annie
Evans	Bronwen
Lewis	Erma
Lee	Brendan
Drumright	Chris
Palacky	Tami
Steinger	Lorenz
Roberts	Anne
Bishop	Melissa
Puca	Robert
Down	Arden
Bassi	Laura
Slater	alice
Herd-Rodriguez	Carol
Solomon	Michelle
Mahood-Jose	Eileen
Abel	Steven
Calamandrei	Judith
Humburg	Margrit
Hirsch	Rhoda
Gonzalez	William G.
Louis	Hilarie
Lee	Ernest
Bennett	Michael
Amsel	Martin
Wong	Jane
Dillon	Ed
Weir	Elaine
Littlefield	Jim
Pickering	Amy
Abdalian	Arline
Lowenbraun	Joe
Muller	K.
Wahl	Bob

Pollens	Richard
Rait	Charles
Rodgers	Zach
Goodman	Ann
Schwartz	Peter
Harmon	Joan
Cutul	Peter
Schulz	Laurie
Ross	Suzie
Weingast	Stan
Durkin	Michaela
Ryan	Megan
Biener	Ofra
Landstreet	Susan
Kent	Barbara
Eilenberg	Alisa
Keramaty	Valery
Laufer	Lorraine
McAvoy	Jean
Garson	Burt
Seitz	Laura
Keegan	Frances
Varekamp	Patrick
Kurtz	Peggy
Anderson	Amy
White	Elizabeth
Hayward	Susan
Gorell	Stephen
Miller	Matthew
Rowe	Blake
wilde	mary
Hudson	Pamela
Faller	Russell
	Jean-Claude
Fouere	Susan
Baxter	Jordan
Glass	
Lipman-Stern	Elizabeth
haverkamp	kathy
Prychodko	Nicholas
Wolgamuth	Mark
Klopfer	Ulrike
Gayler	Anne

Miller	Catherine
Rivera	Javier
Wesley	F. Robert
Evett	Elisa
Sullivan	Gail
D'Errico	Bob
Furio	Victoria
Gilbert	Jay
Angel	Beth
Nichols	Robert
McDonough	Mary Ann
Hayden	Gary
Raup-Kounovsky	Pamela
Fitzgerald	Barb
Gibbons	Patty
Guidarelli	Alicia
Butler	Edward
Keiser	John
jagiello	carol
Fishman	Wyldon
Thal	Terri
Greinke	Pamylle
Zuckerman	Barry
Stein	Sandra
Miller	Russell
Pintagro	Thomas
Fast	Wendy
Farrington	Raymond
Crespo	Frank
Fleishman	Ellen
Gelfer	Michael
Pedicini	Melanie
hazynski	Chris
Casella	Mary
Murtha	William
Takatsch	Julie
Myers	Carol
Dal Cais	Sandra
Perlmutter	Martha
Leonard	Lois
Caldas	Alejandra
Hughes	Kevin
Turco	Preston

Wiley	Kimberly
Stein	Alan
c	a
morse	mariana
Buhner	Susan
Contreras	Jose
Veralli	Robert
Ramos	Joann
Casstevens	Rebecca
Bodnar	Cecilie
Vivian	Nick
kalamotousa kis	c.
Dawson-Rhodes	Juanita
Nowack	Laura
Conca	Joan
Koch	Joann
Correia	M. Cecilia
Rubino	Karen
Evans	Pat
O'Rourke	Kevin
Warren	Carol
Langer	Norbert
Sherwood	Kate
Flood	Patricia
Penta	Richard
Ross	Alice
Birnbaum	Beth
McNamara	Eileen
Dlugosz	Janice
Half	Monika
Goldmark	Leila
Stocker	Michael
Gilbert	Nancy
Menduni	Karen
Kohls	Carl
Petruzzi	Maryke
Goldstein	Sharon
Schneebeli	Chris
Volz-Bongar	Christina
Couchon	Doug
Levine	J.R.
Conry	Susan

Young	Marie
Meyer	Bill
Obrig	Jill
Klippel	Nina
Rostan	Dan
zoubeck	suzanne j
Silver	Chuck
Dietrich	Marianne
Schraier	Sheila
Yacker- Winderbaum	Lolly
Forest	Roberta
Arnow	Joshua
Cheney	Harriet
Kelley	Elizabeth
Cornell	M. Doretta
Heaney	Anne
Pavay	Nancy
Kaggen	Marilyn
Thomas	Charles
Frankel	Donna
Roth	CC
trupiano	marian
Kreiner	Dennis
Goebel Christie	Shirley
Held	Carrie
Viggiano	Lynn
DeNicola	Mickey
Tomic	Betsy
Strong	Bente
Gary	Alan
Pogue	Robert
Edwards	Sharon
Miller	Mitchell
Holman	Andrew
Dibeler	Barbara
Bell	Verne
Torrence	Jane
Solomon	Karen
Gonzalez	Vickie
Connolly	J.Patricia
Williams Jr.	Nathanel
Hegarty	Elizabeth

Bien	Annie
Chalker	Mikki
Dinhofer	Jacalyn
Christof	Victoria
Sucher	Joel
Coleman	Richard
Torres	Susan
Hassett	Gerald
Ulrich	Albert
Clair- Howard	Maria
Stern	Richard
Jackman	George
Pearthree	Pippa
Rodriguez	Sylvia
Lopez - Ortiz	Nina
Caniano	Antonio
Lambert	Dave
Wittenborn	Andrew
Barron	Rhetta
Smith	Crystal
Brown	Denise
Grohman	Paul
Slonaker	Lynn
Aiello	Grace
DeMatteis	Fiore
DeFranco	Ryan
Bruny	David
Bay	Rosemary
Levine	Rhoda
Arnone	K.
Valdemi	Maria
Birnbaum	Jacqueline
Rengers	Edward
Bucher	Anne Marie
Winner	Angelika
Tumas	Irma
Trengove	Thomas
Kribs	Jane
Velez	Francisco
Biro	Juliane
Heffron	Joshua
Dempsey	Sheila
Lawson	Joseph

Considine	Michael
Rydstrom	Gunnel
Nieman	Tamara
Moore	Sharon
Metraux	Doris
Croonquist	Robert
Gellert	Sally Jane
Fisher	Linda
Sharfman	William
Church	David
Scales	Jeffrey
Hinkel	Carolynne
Hollman	Eric
Talbot	Kathleen
Murphy	Theresa
Jordan	Lois
Cooper	Susan
Spiro	Pearl
Stone	Judith
Leitner	Joel
Kilner	Kevin
Comiskey	Thomas
B	L
Cover	Sunny
Morris	Lori
Craner	Julia
Desmond	Katherine
Wangerin	Ruth
Bianchi- Quota	Ann
Long	Bess
b	anna
Leveiseur	Elsa
White	Mona
Gillespie	Susan
De Crescendo	Jocelyn
Adams	Ruth
Hoyt	Lindsay
Rowen	Martha
Leber	M. Carol
Davis	Claire
Rempe	Denise
Wishner	Frederick

Nevins	Joseph
Searl	Ronald
Fisher	Sara
Harragin	John
Fennimore	Laura
Elliott	Christine
Toland	Jo Ann
Moreno	Mayelly
Becker	Stanley
Williams	Lee
Schneider	Terri
BELLOMO	NICHOLA S
Bullock	Beverly
Schlemel	Pierre
Conway	French
Chiappa	Russell
Cooke	Douglas
Seckendorf	Michael
Graham	Judy
Winter	Amy
Kayser	Gabrielle
Ring	Stephen
Hamilton	Sarah
LaRossa	Jennifer
Willis	Suzanne
Cohen	Wendi
ARNETT	RENEE
Lepzelter	Howard
Dunn	Timothy
Betser	Alex
Jones	Steve
Man	Cave
Lipschitz	Jacqui
Dudek	Gertrude
OConnor	Mary Beth
Rochkind	Iris
Lisbin	Adriane
Horton	Chris
Smith	Judith Lenore
Robson	Jim
fsbbo	lucia
lotito	mark

Agro	Joan
ProudFire	Anne
Vinay	Miss
Demarest	Russ
Pliskin	Jack
Mac Nish	Stephen
Korn	Corrinne
pelusi	gwen
Bauman	Joan-Marie
Ward	David
Hulseapple	Daniel
Westfall	Father Joseph
Jackson	Katherine
Jalbert	Amy
Smith	Hildegard
Harte	Sean
mcgeary	mary
Artin	Thomas
fernandez	yvette
Hearty	Thomas
Kramer	Ilene
Keast	Alix
Moser	Janet
Garcia-Macri	Saveria
Wein	Jerry
Tafapolsky	Linda
Raz	Anat
McDonald	Roland
Hills	Jo
O'Sullivan	Katherine
Spieler	Susan
Lashua	Vane
Miller	Marjorie
Polishook	Shirley
Dutt	Ceejay
Schmid	Max
Simmonds	Beatrice
Arroyo	Eric
Fortune	Cecelia
Halperin	Hagit
Phelan	Mark
Othrow	Margaret
Suarez	Moraima

Brandariz	Anita
Brandt	Sara
Berkon	Marilyn
Beutel	Teresa
Jesberger	Leslie
DeCordova	Debra
Burns	Gail
Vernon	Margaret
Kibler	JK
Hastings	William
Pachter	Linda
Lensu	Wayne
Brickley	Mary
Rovedo	Nivo
Stolfi	Jackie
Hricik	Jean
Pedersen	JoAnn
Berliner	Jill
Weinstein	Helene
King	Justine
Wood	Peter
Bennett	Dale
Piercey	Liz
mckiernan	joan
Sloan	Elaine
Fiorillo	Cristina
Weinlich Miltenberg	Anne
Buckley	John
S	Will
Goodenough	William
devinney	claudia
Younger	Kristina
Heller	Mary
Jena	Alice
Iyer	Rahul
Polito	Gene
heloskie	paul
Greenblatt	Rachel
Scaltrito	Marietta
Iacovitti	R
McKnight	Alan
Erny	Susan
Koff	Susan

Desmond	James
Rosenblum	Pamela
Seaman	Barbara
	Paula
Algarin	Kim
Krane	Lori
Carney	Norma
blandford	mark
Gutierrez Walsh	Carol
Smith	Sue
Lamoreaux	Rebecca
Frantz	Kathe
Ziegler	Bart
Machan	Dyan
Healy	Elizabeth
Nelson	Lorraine
Stephan	Monica
Strickland	Dan
Vericker	Carol
Gutierrez	Monica
Sellon	Louise
	White Feather
Curtiss	
Dalle Carbonare	Paola
Fierle	Mary
Gussow	Joan
Kuhn	Jean
shea	dennis
Lobmeyer	Veronica
LaForgue	Denise
Brandt	Peter
Reeves	Joyce
Phillips- Burke	Mary
Smolin	Audrey
Blitzer	Bobby
May	Rob
Beutel	Marisa
Mullan	Mary Jo
Scott	Art
Healingline	Helgaleena
Folks	Sara

Campbell	Christina
Gordon	Ben
Eisner	Phyllis
Brinkman	John
Andrea	Michael
Saperstein	Steven
Fein	Jon
Livingston	Elaine
Smith	Mary
Cohen	Jo Ann
McAllister	Garrett
Leitner	Jonathan
Klosterman	Pete
Nussbaum	Sally
Nandagiri	Courtney
Pascucci	Adele
Ivens	Ellen
Jaster	Bette Ann
Waite	Judith
Henry	Michel
Gordon	Grace
Israel	Jody
ozkan	dogan
Banks	Janice
VanHoesen	Michele
Dilascio	Marilyn
Storm	Ike
Yuzawa	James
Shanen	Ruth
Muzii	Roger
Miller	Edward
McMorrow	Jennifer
Dakouzlian	Marge
Prown	Lise
Eleby	Gabriele
Adam	Roberta
Stein	Robert
Elling	James
Marallo	Clint
Wehner	Michael
P-Britt	K.
Burnett	Molly
Harris	Beverly

Melita	Dominic
Messer	Gloria
Gover	Janet
Williams	Courtney
Inserra	Marie
Fastook	Mary Ann
Ferguson	Earl
D'Arrigo	Katelyn
Pennoyer	Christy
Malloy	Timon
Hanson	Elizabeth
Beer	Ingrid
	Emmanuell e
Hernandez	
Fiore	Keri
Potts	Daniel
Potts	Hildreth
Falik	Eugene
Kover	Elihu
Skelly	John
Poccia, RN	Peter
Anderson	Tracy
Funiciello	John
Anderson	Katherine
Ward	Marc
Nam	S.
Vromen	J
Lee	Diane
Munsie	Jame
Brodhead	Frank
Burton	Margaret
Mallonee	Mary
Classen	Meryl
McMeehen	Alice
Lennon	Jennifer
Eisinger	Gary
Chase	Binnie
Washburn	William
Steckler	Doug
Nagy	Christopher
Fallon	Jean
Knowlton	Christine
Haviland	Ann
Smith	Teresa

Elkin	Liz
Lanser	Steven
Vann	Nancy
Killeen	Karen
Lipkowitz	Ana
Ruscigno	Mike
Carpino	Dawn
Woodard	Naomi
Garcia	Javier
Turner	Deborah
Kirch	Eve
Rehn	Timothy
Ryan	Thomas
Boothe	Mary
Gronim	Sara
Simeti	Francesco
Robin	Carol
Farrar	Kelly
Levine	Nina
Guy	Christine
Innerhofer	Margaret
Adams	Amy
Andersen	Kirsten
Burkhardt	Laura
Bijur	Polly
Freel	Susan
Costantini	Luigi
Reader	Mary
Broekman	Marinus
Bartoo	Roy
abramson	barbara
Short	Skip
Kenney	Steve
Rothman	Monique
Bellrose	Susan
Joslyn	Barbara
Speer	Paula
Levitt	Jeff
Englesson	Greg
Carr	Leslie
Edelson	Denise
Flanagan	Margaret
Chapman	Matthew

Schneider	Ursula
Grahan	Leina
'm	I
Bauman	Stephen
Julian	Greg
Grice	Anthony
Olsen	Emelia
Connor	Beth
Smith-Spanier	Karin
Mayer	Evy
Darrigo	Lisa
Bunde	Janet
Knauf	Carla
Carey	William
Hase	
McLaughlin	Kirsten
Mcpeake	Mary
Trimble	Bill
Bartnicki	Olga
Buchalter	Jan
	Margaret
Finch	Julie
Cyphers	Jane
Forman	Janet
Venidis	Maria
Dominiak	Adam
Polonka	Jack
DiMunno	James
Walsh	Gerald
Adams	Sean
Praus	Diana
Priem	Lou
Jones	Robert
Horowitz	Jennifer
Randers-Pehrson	Hale
Christoff	Stephanie
Van Brocklin	Matthew
O'Sullivan	Joseph
Downes	Susan
Kozlik	James M
Rosenthal	Jennifer
Lupowitz	Martin

Cardello	Patricia
Nolan	Matthew
Renda	Anne
Brunner	Linda
Oltarsh	Victoria
Bartow	Wayne
O'Connor	Eileen
Arno	Iris
Bauer	Elisabeth
Rheder	Richard
McManus	Jill
Curlee	Jean
Ford	Krystal
Arnow Brill	Elyse
Gotto	Dorothy
Friedman	Nancy
Salzberg	Laurie
Brody	Edward
Katz	Jeffrey
Provost	Clifford
Williams	Natasha
Schwartz	Anna
Ashton	Leslie
Holman	Thomas
Pace	Irene
Darlington	Beth
Asteinza	Maria
Jussim	Jude
Lakatos	Marion
Luciano	Leslie
Gannon	Michael
Santiago	Elizabeth
Simon	Harvey
Harold	Martha
Houghton	
Brown	Nancy
Messing	
Walsh	Jeanne
Fursich	Robert
Goss	Carol
Ann	Cathy
Nuccio	Sue
Greenfield-Sanders	Karin

West	Sarah
Clelland	Susan
Olsson	Robert
Bowdery	Lynn
Stein	Jane
Ackerman	Deborah
Dewey	Deborah
Flaherty	Kathy
Harrison	Lisa
Carmichael	Nancy
chung	jean
sayre	johannes
Farrell	Peter
Martin	Tracy
hegegan	elizabeth
Marcy	Barbara
Elie	Marilyn
Brewster	Marcia
Kresek	Mary
Lawrence	Harriet
Dale	Jordan
Lechner	Jo-Ann
Nandabalan	Santosh
Lincoln	Alexandra
McGee	Richard
Irwin	Kristin
Suter	peter e
tyndall	carl
Olson	Daniel
Kolaitis	Maria
Bayardi	Bonnie
McGlynn	Michael
Morrone	Marina
Freeman	John
Zias	Billy
Mayer	Stanley
Hamilton	Vernon
Meisinger	Joyce
Veneziano	Odette
Ungar	Elizabeth
Gallea	Dean
Doherty	James
Rivers	Jerry

Winn	Patricia
zazzera	elisa
Kirgan	Nadia
Hansel	Bettina
Deitz	Jess
Gellman	Barbara
Walters	Wendy
Sava	Mike
Benoit	Madalyn
West	Cory
Boyajian	Beatrice
English	Leslie
Linehan	Steven
Hoopes	Melanie
McClintock	Martha
Seely	Margaret
Mancini	William
Callahan	Stephen
Orum	Shyama
Becker	Margot
Bassen	Todd
Quirk	Joe
Specht	Leola
santiesteban	rosemarie
Rodriguez	David
Voda	Candace
O'Sullivan	Ellen
Lichtenberg	James
Goulet	Stephanie
Kennedy	William
Rossi	Christina
Schofield	Kevin
Hedlund	Laurie
Kaczorowski	Florence
Heidgerd	Jane
Taylor	Peg
Esteve	Gregory
Lipkin	Lisa
Schulof	Bob
Tucker	Andrew
Larson	Karon
Smyth	Elizabeth
Ackerman	Celia

Cheetham	Cheryl
Vamos	Tara
Polvere	Natalie
Bain	Diana
Kristin	Lauren
Pagano	Rick
Furlong	Bonnie
Coyne	Brendan
Steinberg	Viki
Sorensen	Karen
Weigel	Charlene
Wang	Jonathan
Saunders	Felicia
Gilmore	Elizabeth
Eng	Martina
Jelly	Patricia
Warren	Edward
Kohn	Daniel
Ryan	Joanne
Farrell	Lisa
Pistolesi	Linda
Haffner	Nancy
Ryan	Joanne
Dague	Barbara
Terjanian	Sonya
Yeh	Hai-Ping
Dittmar	Dennis
Korn	Jane
Coyne	Colin
Gorman	Deborah
Sarg	Steven
Cedeno	Sherri
Farber	Joan
Moran	Thomas
Kittner	Cary
Eichin	Barbara
Zweig	David
MacDonald	Steve
Repasky	Mark
JACOBSON	FRANCES
saturen	yak
Fasano	Peter
Aronson	Shirley

Lawless	Marlee
Rapetti	Gigi
Barrick	Marcel
Finnigan	James
Epstein	Daphna
Kernan	Susanne
Fitzelle	Edward
McCloskey	Clodagh
Ellingsen	Roy
Suchman	Peter
Fuhrer	Cynthia
Kramer	Stella
Sweeny	Glynis
Aanes	Brendan
Bruno	Laurie
Shimpi	Nikhil
Filkoff	Cynthia
Nitz	Erika
Prasad	Sunita
Rauch	Ann
Weber	Cheyenna
Krash	Kallyn
Steinfeld-Cavuoto	Lauren
Kaye	Carole
Goldberg	Julie
Kooney	Kathy
Baker	David
Leonard	Eileen
Shepard	Hannah
Comaskey	Margaret
Dietrich	Monica
Primomo	Christine
Trumann	Cal
Broemme	Leo
Baloy	Mikki
Snider	Sarena
O'Brien	Daniel
Simpson	Elisabeth
Lee	Ann
Topornycky	Patricia
Busani	Elena
Zadina	Ieva
Fortgang	Mindy

heloskie	paul
Adorno	Jeffrey
Dal Cais	Sandra
Hoening	Phyllis
Tucker	Michael
Schroeder	John
Faltin	Meredith
Berland	Robyn
Milano	Carol
Ashkin	Michelle
MILLER	MELANIE
Evans	Richard
Swerdlow	Marian
Leide	Chris
Monahan	Anne
Fabend	Firth
Azcue	Mia
Hinnenkamp	Miranda
Hollar	Julie
valentine	jennifer
Carter	George
Christenson	Michelle
glaser	meil
Shotz	Alyson
Youens	Rachel
Gordon	Bernice
Gill	Constance
Diss	Marybeth
Fleischer	Wendy
Steinrueck	Alrun
Haug	Lance
Rieser	Michael
Erfer	Christy
Intilli	Sharon
Gonzales	Matthew
Regen	Hamilton
Rapetti	Regina
Dziurka	Jennifer
Esteves	Lori
Papa	Chris
Greene	Manna Jo
K	Tiffany
Walters	Kathy

Taylor	Mark
Barbone	Shannon
Skolnik	Simon
Drew	Lindsey
Milliken	Gerry
Stoll	Rainer
Heitz	Barbara
Walag	Lisa
Polgar	Richard
	Tahira
Alford	Faune
Van Dolsen	Ed
Hush	Emily
Gershgorn	Laurie
Polak	Selene
Fetta	Christopher
Straus-Stone	Terry
Burns	Victoria
green	sirena
Hultgren	Dave
Fox	Vicki
Guiney	Dennis
Nervig	Ruth
Collins	Jane
Cozza	Laurie
	Richard & Lucy
Zaslow	
Mann	Jon
Milano	Carol
Caccoma	Elaine
ADLER	STEVE
Ironbiter	Suzanne
Furlong	Bonnie
Dickey	Joanna
Cheo	Martha
Alpern	Robin
downes	susan
Clements	Roberta
Reich	Peter
Oltarsh	Victoria
Codacovi	Robert
Khorover	
Aikens	Natalya
Segel	Lois

Anikow	Mary
Silva	Roger
Fox	Eve
Butler	Katharine
McLaughlin	Brian
King	Sr. Barbara
Wedge	Janet
Wilce	Joan
Rogers	Amie
Baron	Jinhi
Mock	Kathie
Milligan	Ned
Bartels	MaryAnn
Fairhurst	Pat
Ahlmen	Amy
Johnson	Jacqui
Morris-Karl	Kathy
Sunshine	Jennie
Hamilton	Nicholas
Conlin	Rosemarie
Debreczeni	Gabor
Cosentini	Adrian
Hunkler	Lisa
Robin	Fred
Ross	Lilli
McSpedon	Jacqueline
C	J
Kellerman	Marty
Elliott	Jacob
Matteson	Patricia
Hendry	Diane
Juan	Suzanne
Fleischman	David
Miller	Maureen
Reutershan	Ryan
Englander	Diane
Boughton	Rick
Albertson	Mark
Goldsmith	Amy
Ross	Richard
Parks	Sheila
Rosmarin	Amy
Gans	Hank

Grogan	Ellen
Chadwick	Phyllis
Lankester	Kris
Appleton	Julietta
McTague	Bobb
kownacki	toby
Lakatos	Edward
Shilling	Y.
Cardinale	Christina
Brosius	Cary
Almonte-Zwick	Maribel
Harkins	John
Girouard	Jena
Howley	Sister Ethel
Kelly	Edith
Perry	Kristina
Sarnoff	Lori
Golubski	Ashley
Waldron	Thomas
Simpson	Homer
Corrao	Kathleen
milano	carol
Podolski	Marc
Woogen	Beth
Ferretti	Joseph
Skrzypek	Betty
Cherson	Jeremy
Rodriguez	Heriberto
Malik	Lalita
Curatola	George
Pisano	Lisa
Lutwin	Nancy
Harris	Theresa
Balaban	Arlene
Fredericks	Misha
Reilly	Eileen
stoe	carolyn
Smith	Diamond
Besemer	Judy
Sankeralli	Anmari
Reeves	Deborah
Vuotto	Mario
Schmidt	Mary

Projansky	Camala
Iwane	Cathy
FRACZEK	KIM
Bucci	Mike
Gutkes	Greg
Moriarty	Therese
Rutman	Susan
Schles	Ken
Pfeiffer	Fred
Padawer	Jill
Stephens	Maura
Mulvey	Michael
Parr	Elizabeth
Johnson	Carla Rae
Snider	Linda
Kopelman	Arthur
Gillen Jr	Fred
Leimanis	Andra
Powitz	Alan
Hito	Susan
Watkins	Richard
Denlinger	Elizabeth
Cipriani	Casey
Steward	Sarah
Fraley	Cynthia
Fitzgerald	Lindsey
Abrahams	Allen M.
Tumi	Reed
Kourie	Kathleen
Lipp	Barbara
Dinda	Joe
Muscolo	Rosemarie
Kline	Robin
Kline	Richard
Nevins	Jessica
Choi	Ignacio
Goldberg	Kerry
Canepa	Judith
Shapiro	Peter
Healy	Maureen
Kamps	Kevin
OBrien	Judy
SANTIAGO	TONY

Beeny	Diane
Schwartz	Ben
Marcy	Jane
pinetree	lois
Lazarus	Anne
Flynn	Joan
Finneran	Mary
Curtis	Linda
Grossman	Bozena
Hutner	Heidi
Ball	Lillian
Creedon	Martha
Forlano	Julianna
	Paulette
Gordon	Marcy
Rosen	Bruce
Hardinger	Ruth
silver	trudy
Berry	Edward
Levokove	Mindy
Brameier	Ann
Geist	Sheila
Delga	Maria
Inoue	Mari
Nettleton	John
Hilger	Clare
Ross	Tom
Senghaas	Phyllis
Soychak	Elizabeth
Hughes	Timothy
Beard	Joan
Leaf	Nydia
Caputo	Joan
Brown	David
Nelson	Jack
D	K
Penta	Richard
Luchnick	Lon
Silverstein	Cynthia
Smith	Suzan
KELLY	PAMELA
Goldman	Brenda

Weininger	Ellen
ROSSA	Jennifer
Lacore	Alicia
Pryde	Sharon
Zahm	Barbara
campo	frank
Metz	Julie
O'Neill	Kevin
Morrison	Daniel
Brown	Kevin
Aloney	Pat
Jaegers	Martha
Zipf	Deborah
BLAU	DEBORAH
Norquist	Raun
Marangoni	Carol
goldman	steven
lawner	stephanie
Shevis	Aron
Kent	Stephen
Lipschik	Matthew
Gunther	Mary
Freedman	Michelle
Sturm	Lois
Rath	Suzanne
koritz	Raleigh
Saltzman	Dale
Faltin	Meredith
Appel	Michael
France	Tom
Weisenberg	Mark
Spola	Richard
Simpson	Barb
Doud	David
Moran	Gail
Donohue	Mari
Benesch	Amy
Frost	Judith
Stoleroff	Debra
lane	mary
Fein	Jon
Dunkerley	Harriet
Schmidt	Maria

Kelly	Corinne
McMorrow	Jennifer
Kilner	Kevin
SWEENEY	KATHLEEN
Broekman	Marinus
Benson	Kimberly
Forwand	Arlene
Forman	Ellen
del Giorgio	Analia
Yacoub	Katerina
Klein	Lillian
Smith	Mary Ann
WALAG	LISA
Craig	Madeline
Wildrick	Jesse
Puc	Puca
Andringa	Wendy
Papandrea	james
Weintraub	Manda
Ellis	Wayne
Cesar	Stanley
Buckley	Kathy
Mulligan	Shannon
Herron	Peggy
L'Heureux	Sarah
Oppenheim	Adrienne
Mott Jr.	Robert
Davison	George
Keoughan	Patricia
Arena	Joseph
Doolittle	Chris
Tabin	Sandy
D	Debora
BURBY	Leslie
O'Brien	Edita
Kourie	Kathleen
Garrick	Chris
Gallagher	Patrick
Gougelmann	Andrew
Timm	Donna
Parker	Christian
Pierce	Ellen
Reimann	Janine

Fedina	Elena
Dilley	Steve
CARRASQUILLO	MICHAEL
Cardinali	Sandra
Cipriani	Casey
Marcinek	Sally
Margolin	Ellie
Garvey	Lydia
Brady	Kathleen
milano	carol
Cintron	Walter
Goldhammer	Allan
Smyth	Douglas
Ross	Judy
Gilbert	Lynn
Altenbern	Taylor
Hito	Susan
Keegan	Michael
Sullivan	John
Korizis	Spiro
Reichley	Simon
Gerstein	W
COULTER	JANIE
Dunn	Scott
Rose	Eileen
Andrews	Alice
Diele	Claire
Males	Robin
Wright	Richard
Zerilli	Jamie
morgan	lael
Chardack	Helen
Kaywin	Emma
French	Barbara
Steiner	A.L.
Imperato	Sarina
Barrow	Ting
Castellanos	Erick
wilson	joan
Bierko	Scott
Jones	Sally
Montroy	Daniel
Maxfield	Fred

Dellinger	Michele
elmiger	suzy
Clarizio	Theresa
Schwartz	Leah
Lemonik	B. R.
Fox	Vicki
Steiner	Alan
schwartz	enid
ESPOSITO	CHRISTOPHER
Ickringill	JL
brotter	bruce
liptscher	larry
Azzarelli	Rebekah
Mechaley	Susan
Napolitano	Marie
Hanuman	Kenda
Degiglio	Wendy
Seitz	D Tim
Goodman	Howard
Allen	Karen
Giller	Evan
Pear	Joyce
KRSTEVSKI	SHEILA
Minichino	Maurice
Jacobson	Eric
Stout	Marianna
Zackrone	Alex
Clark	Craig
guillien	catherine
Fuhrer	Robert
Spear	Duston
Kennedy	Devon
DaSilva	Vicki
Gingold	Joel
Barrett	Elizabeth
Breznak	Lisa
Sperling	Kenip
Ekelund	Kendra
Cummings	Susan
Druck	Bette
Egol	Lew
Leimanis	Aija

Bustos de Romagna	Andrea
Stark	Diane
Couchon	Doug
FABRIZIO	ADRIENNE
Illingworth	Melinda
Jankell	Alice
Hinkle	Valerie
Cole	Alexis
O' Connor	Chris
T	Melanie
Lorio	Vincent
Platero	Tracy
Basile	tracy
Knipp	Donna
Hoover	Karen
Weinstein	Seth
Mahler	Lucy
Heckhaus	Maryanne
MOCHA	Bianca
Muenzenmaier	Kristina
Frasca	Denise
kettell	meg
Swords	BW
Vigna	Lauren
END	ANDREA
Edwards	Ezekiel
Dessauer	Leyana
Kotula	Orin
Apicello	Jocelyn
FIERO	Columbia
Cummings	Patrick
Hertz	Lisa
Sales	Aishah
Young	Jane
Sefer-Stefancic	Ljubica
Weaver	Carolyn
Holt	mary
Deady	Jenny
wittman	william p
Pichler	Barbara

Cummings	Alicia
Hook	Natalia
Willis	Callie
Adams	Elizabeth
Kaminsky	David
Dourm	Deborah
Hunt	Jess
Fleder	Marilyn
McCormick	Beth
Lavin	Debra
Biesanz	Karen
Beydon	Camille
Gerstein	B
Ryan	Loretta
Ball	Lillian
Orsi	Brian
Spatta	Rina
Derrickson	Lisa
Shur	Hagar
FArrey	Kathy
Espinosa	Cathy
Kelly	Brian
Inserra	Marie
Lieberman	Linda
Newman	Carol
Fishman	Wyldon
Davis	Jennifer
Lessley	Catrina
Stein	Andrew
Robles	Adrea
Browne	Deborah
Landzberg	Al
Gary	Michael
Bagdy	Diane
Marino	Tony
Sweet	Linda
Lane	Ned
publieee	jean
Kolodny	Robert
Melillo	Janine
Biondi	Patricia
Johnson	Jane
Hanson	Marc

lourenco	paul
Clarkin	Regina
Grassia	Linda
Quick	Valerie
ERICKSEN	ROGER
Eichenholtz	Marylyn
Cole	Tracy
Leff	Claudia
Chamberlin	Erika
Linger	Eloise
Kelley	Samantha
Pollack	Carl
Boudart	Jan
Armstrong	Tyler
Pelikan	Tina
Lahey	Jennifer
Rubick	Margaret
Brammer	Karen
Jacknick	Christine
Lanzman	Sarah
KESSLER	CAROL
Antulov	Tasha
Horder	Catherine
Lamanna	Pat
SALERNO	JUDITH
Good	Jacy
Israel	Nancy
Judd	Barbara
Rosin	Cindy
Sarna	Ellen
johnson	david
sloane	steve
Bohan	Joseph
Sheehan	James
Luciano	Tom
Ahern	Elizabeth
Herron	Fred
Smith-Spanier	Karin
Szabo	Andrew
Cross	Allisom
Magee	Rowan
leeftink	peter
Sterling	Jody

Rubin	J.
PRESTIANN I	STEVEN
Jacobs	Jake
James	Chip
smith	betsy
Parkhurst	Kathleen
Rosman	Janie
Feiner	Emily
Holste	Mary
Codman III	John
White	Steven
Kaney	John
Rogo	Gail
Clark	Karen
Brosnan	Maire
Foster	Doug
Halprin	Jessica
Hornig	Mady
Hirsch	Meryl
Schiffer	Mia
Lobel	Kelly
Staffanell	Nora
McVety	Catherine
Lefkowitz	Sande
Epstein	Hadassah
Wilson	Johanna
Carroll	Steven
Green	Marie
cairns	carolyn
Leizman	Lydia
Leone	W & V
Grimes	Cara
Bernstein	Peter
Albanese	Nanette
Selikson	Sandra
nordhauser	eva
Kernan	Dean
Ironside	Maria C
Torres	Katie
Dzierlenga	Kathryn
Lenge	Robin
Muir	Janet
Whelan	Margaret

Pfeiffer	Janice
Springer	Grace
venegas	santiago
Goldstein	Benjamin
Rosen	Joan
S	A
Rubinfeld	Jerry
Tambini	Eve
Leshner	Janet
Bowen	Nancy
Pohl	Colin
Rosenberg	Norman.
Pacenza	Robert
Brewster	Katherine
Harmon	Janet
Lorenzo	Peter

Devito	Todd
Hamilton	Heather
Barden	Zachary
Iannaccone	Suzanne
Mooney	Scott
Timar	Beata
Schwab	Kevin
Siciliano	A
Weiner	David
Negrin	Michael
Hall	Suzanne
Feuz	Ariel
Despres	Christine
Pascuzzi	Alison
Hudson	Amanda
Safford	Sherna

Angerosa	Jordan
Diamond	Amelia
Cloud	Jarrett
Kastner	Theresa
Haverfield	Tiffany
Jenkins	Chris
dorsky	joshua
Shulman	Beth
Surman	Barry
Lynch	Elizabeth
Obaid	Taryn
Doherty	Joann
Topinka	Chris
McClurg	Gail
Schnell	Patrick
Rodrigues	Pete