



United States Department of the Interior

NATIONAL PARK SERVICE
Cape Cod National Seashore
99 Marconi Site Road
Wellfleet, MA 02667

In reply refer to:

A18

March 30, 2012

The Cape Cod National Seashore Advisory Commission
Cape Cod National Seashore Headquarters
99 Marconi Site Road
Wellfleet, Ma. 02677

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Pilgrim Nuclear Facility

Dear Sirs:

The Cape Cod National Seashore Advisory Commission was authorized by Section 8 of PL 87-126, part of the enabling legislation which created the Cape Cod National Seashore in 1961. We are one of the oldest National Park Service advisory bodies in the nation, and subject to The Federal Advisory Committee Act of 1972 (PL 92-463). Our charge is to "serve in various matters relating to the administration and development of the Seashore by the federal government as liaisons between the federal government on the one hand, and state and local governments on the other."

Our members represent the six outer Cape Cod towns, as well as Barnstable County, the Commonwealth of Massachusetts and the United States Secretary of the Interior. We are appointees of the Secretary of the Interior. Matters that come before us include: the regions' cultural heritage, town bylaws, endangered species management, renewable energy projects, maintenance of Park properties, coastal erosion/shoreline change and other types of environmental impact that effect our region.

It is with regard to environmental impact and the safety and well being of our citizenry and visitors that we focus our attention in this letter; and we respectfully ask you to do the same. We wish to bring forward our concern regarding the issue before you of relicensing the Pilgrim Nuclear Plant in Plymouth, Massachusetts. We are aware that a 20-year extension of that facility's license is being considered, even as we remember the tragedy at a twin design plant in Fukushima Japan one year ago.

Our geographical relationship to the Pilgrim Nuclear Facility is unusual. Over water we are about 25 miles away, across Cape Cod Bay. By land we are 50 to 90 miles away. To leave the Cape one must follow (mostly one lane) Route Six, our only evacuation route. This route follows the curving arm of the Cape towards one of two vehicular bridges which connect us to the mainland across the Cape Cod Canal. During the summer season our population surges as hundreds of thousands of visitors from around the nation and the world come to enjoy the pristine beauty of our maritime towns and beautiful beaches. They come to experience up close encounters with whales on commercial whale watch boats, and to enjoy the antics of dolphins in our waters and seals resting on offshore sandbars. They come to enjoy the culinary treats of freshly caught fish and shellfish which thrive here. They come to get away from it all.

If there were an incident at the Pilgrim plant, which caused a plume or radioactive substances to waft over the Cape on the prevailing southwesterly winds, our citizens, seashore personnel, and summer visitors are in harm's way. You should know that a significant number of visitors to the National Seashore are often day-trippers from the mainland who do not have overnight accommodations for sheltering indoors. All attempts to evacuate by way of our only land evacuation route would be futile, indeed contraindicated, as that would only bring us much closer to Pilgrim. In the summer, even under normal circumstance, egressing traffic at the bridges can produce a miles long caravan of cars, backed up for several exits before the bridge. A report of a radioactive leak or even a rumor of one could cause panic and mayhem on the roads. Exiting over the bridge would be even more impossible as people evacuating from the Pilgrim area produced increased southbound traffic on Route 3 on the mainland.

As townspeople of the outer cape, we know that in the event of an incident we would be advised to shelter in place in our homes, schools or designated shelters. We would be advised to stay locked inside and block off all sources of ventilation as the plume settled over us. If we were well informed, and had planned ahead, we may have stored enough Potassium Iodide for our families to last two days, to stave off the cancerous effect of Radioactive Iodine on our thyroid glands. Even so we know that a wooden frame house would only provide a 10% dose reduction and a masonry building just a 40% dose reduction. There is nothing we could do to ameliorate the hazardous effects of other noxious radionuclides, with long half-lives.

As an advisory body to a national park, our attention must also turn to the health and safety of our park personnel and our many visitors. We have several questions. How would the Nuclear Regulatory Agency ensure public safety in the event of a Fukushima scenario at Pilgrim? We need your assurance that a plan is in place. What is the plan? What coordinated, interagency preparations have been made to protect our visitors in such an emergency? Assurances that such an event is highly unlikely do not address our concerns.

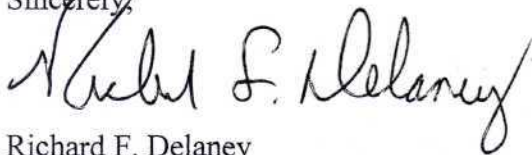
We know that it was the prolonged interruption of electrical power at the Fukushima plant that added to the catastrophe. A prolonged power outage, with loss of circulating water to cool the spent fuel rod pools, caused a buildup of hydrogen gas. As a result explosions ensued which contaminated the area with radioactive toxins. Who would have predicted that their back up plans for generating electricity via batteries or generators would fail? But fail they did.

The Pilgrim facility's method of storing spent fuel rods is similar to Fukushima's, and is compounded by the reality that the pools contain more than three times the amount of fuel rods ever intended to be safely stored in them. The spent rods at Pilgrim are not encased in concrete and steel containers. The Pilgrim facility is vulnerable to a power outage from many causes. We will not enumerate them all. Most likely, potential loss of power in our region can occur due to snowstorms, ice storms, hurricanes, flood and tornados. All such storms have occurred in our state recently. The back up plans for delivering power are similar to the failed plans in Japan.

In the face of these facts, and until we can be assured that there is no threat to public safety and adverse environmental impact, the Cape Cod National Seashore Advisory Commission stands in opposition to the relicensing of the Pilgrim Nuclear Power Plant.

Thank you for your anticipated response.

Sincerely,



Richard F. Delaney
Chair, Cape Cod National Seashore Advisory Commission

cc: MEMA
Entergy
MDOPH
FEMA
Governor Patrick
Sen. Brown
Sen. Kerry
Rep. Keating
Sen. Wolf
Rep. Peake
Superintendent Price
Secretary Salazar