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## OF NUCLEAR INTEREST: Pilgrim Nuclear's flawed FLEX plan

To address the lessons learned from the Fukushima Daiichi nuclear accident in 2011, a U.S. Nuclear Regulatory Commission (NRC) Task Force recommended that nuclear facilities augment their emergency response plans in order to keep reactor cores and spent fuel pools from melting down due to extended loss of electrical power, called a "station blackout."

To address the lessons learned from the Fukushima Daiichi nuclear accident in 2011, a U.S. Nuclear Regulatory Commission (NRC) Task Force recommended that nuclear facilities augment their emergency response plans in order to keep reactor cores and spent fuel pools from melting down due to extended loss of electrical power, called a "station blackout." Soon afterward, the nuclear industry rolled out its own response plan, dubbed Diverse and Flexible Coping Strategies, or FLEX. These strategies must be independent of any usual operating systems and be flexible enough to address blackouts that occur for reasons not anticipated in the original site design – such as storms, terrorists, seismic events and flooding.

In February 2013, Entergy Corp., the Louisiana-based company that owns Pilgrim Nuclear Power Station, submitted its FLEX plan to the NRC. The NRC approved Entergy's plan in December 2013.

Without presenting the comprehensive FLEX plan to local and state regulators, Entergy made piecemeal applications for permitting and licensure. Sound familiar? This is the same strategy Entergy took when it started building the dry cask storage nuclear waste dump two years ago at Pilgrim. Entergy failed to apply for local zoning approval until concerned citizens asked questions. So here we go again with Entergy's FLEX plan.

On November 18, 2014, at the request of concerned citizens, the Massachusetts Department of Environmental Protection (DEP) held a hearing at Plymouth Town Hall, where citizens exposed obvious weaknesses in Entergy's FLEX plan. One of the most glaring deficiencies is the anticipated year-round and all-weather functionality of a manual outhaul pulley system with moorings to be deployed on public lands in Cape Cod Bay. This type of outhaul system is traditionally used during the summer boating season to moor light watercraft in water deep enough to prevent grounding during low tide. Entergy proposes to use this outhaul system to access and then pump seawater to the reactor to prevent a nuclear meltdown during a station blackout. Past station blackouts at Pilgrim occurred during extreme weather events (i.e., high wind events including Nor'easters, hurricanes, snow and ice storms, etc.). Entergy's proposal for such a manual outhaul system whose performance ability will also be limited, diminished or even rendered useless during severe weather events is simply a ridiculous emergency plan proposition.

Additionally, Entergy's license application for the moorings and outhaul system becomes a license to pollute Cape Cod Bay during a Pilgrim nuclear emergency. This is because Entergy has no plan to capture the seawater dumped on the reactor to prevent a meltdown from flowing back into Cape Cod Bay, now contaminated with radionuclides and other pollutants.

Did the U.S nuclear industry and the NRC really learn any lessons from Fukushima? The smart money, the bankers and insurers, still find commercial nuclear reactors too risky to finance and insure without government backstops to corporate limits of liability. Is it any surprise the general public has come to the same "too risky" conclusion about Pilgrim? Aspects of Entergy's FLEX emergency planning proposal for preventing a nuclear catastrophe simply don't pass the straight-face test. They are not reliable, best money can buy strategies for the reasonable assurance of public safety, the preservation of the environment, and proper public purpose during a Fukushima-level event.

For more information, including Pilgrim's FLEX plan and a video of the Nov. 18th hearing referenced above, please visit [capecodbaywatch.org](http://capecodbaywatch.org).

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