COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of Entergy Nuclear Operations, Inc. and Entergy Nuclear Generation Co.	OADR Docket No. 2015-009 DEP File No: Waterways Application No. W14-4157, Superseding Written Determination Plymouth, MA

REBUTTAL TESTIMONY OF WILLIAM MAURER

I, William Maurer, hereby depose and say:

1. My Pre-Filed Direct Testimony ("PFDT") dated June 29, 2105 has been filed in the above-referenced matter. This is my Rebuttal Testimony in response to the Pre-Filed Direct Testimony of the Respondents Massachusetts Department of Environmental Protection ("DEP") and Entergy Nuclear Operations, Inc. and Entergy Nuclear Generation Co. ("Entergy").

2. In preparation for this Testimony I reviewed the Pre-Filed Direct Testimony of Entergy's witnesses Eric J. Las and Philip D. Harizi and the Department's witness David Hill and exhibits.

3. Harizi states that he disagrees with my PFDT ¶ 21 and claims that the outhaul system "has been designed and will be deployed in a manner that is reasonably achievable." Mr. Harizi's PFDT contains inconsistencies and fails to provide information to show that the system will not pose an unreasonable threat to navigation, public health or safety, or adjacent buildings or structures if damaged or destroyed in a storm.

a. Harizi states that the system is designed to be deployed in the "absolute worst-case scenarios," Harizi PFDT ¶ 12, 13. He claims it is "very unlikely" it would be

deployed at the "height of a violent storm." Mr. Harizi's statements do not say that the system will not be deployed in such a storm.

b. Harizi states it "vetted" the Kochek Strainer, Harizi PFDT ¶ 19. Entergy has provided no documents to support this statement that it was "vetted." Such documents could include results from a testing laboratory or from the manufacturer to show that it the Kockek Strain is structurally sound and appropriate for use in coastal waters during storm condition.

c. Harizi states the seawater will flow through the safety relief valves or other flow path to the Torus. Pilgrim's safety relief valves have a history of failure. Recently Entergy was required to install replacement two stage relief valves at Pilgrim.

4. Harizi states that during the 30-day period "there would not be any need to discharge cooling water" to the Bay. Harizi acknowledges there is a chance that such a discharge could happen, since he describes the use of back flow preventers to try to avoid such a discharge. Harizi PFDT ¶ 14(d).

5. Contrary to what Harizi states in PFDT ¶ 20, past outages or Loss Of Offsite Power events at Pilgrim are directly related to the need for a FLEX system. In the past, severe weather events like those that could lead to or be part of a BDBEE event such as severe winter weather, Blizzards or Nor'easters have put Pilgrim one step away from losing "preferred water sources." See, Harizi PFDT ¶ 20. If Pilgrim loses off site power and its onsite generators fail, it would lose cooling capabilities for the spent fuel pool and reactor.

William Maurer

Signed under the pains and penalties of perjury this 17 day of September, 2015.