

## Town of Duxbury Nuclear Advisory Committee

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May 24, 2017

To the Chair and Members of the Decommissioning Citizens Advisory Panel:

The Town of Duxbury Nuclear Advisory Committee, on behalf of the citizens of Duxbury, request that the DCAP work on the following issues to better protect our citizens, the region and Commonwealth.

### **Spent Fuel**

- Spent nuclear fuel assemblies should be moved as soon as possible out of the pool and into dry casks, sited on higher ground away from the shore and hardened against terrorist attack. Because the canisters may crack, spare outer packs should be stored onsite.

### **Finances**

- The Licensee (e.g., Entergy) must pay for decommissioning in full, not the Commonwealth's taxpayers. Support S. 1837, pending at the State House. It establishes an annual fee on the licensee to set up a decommissioning trust fund in the office of the State Treasurer. The purpose is to assure there is a "savings account" if the licensee runs short before decommissioning is completed. If there are insufficient funds, the taxpayers are protected; if there are sufficient funds the licensee gets the money back with interest.
- Decommissioning Trust Fund – Restrict its use to decommissioning; not taxes and operating expenses.

### **Site Restoration**

- Establish a state cleanup standard more conservative than NRC's, with risk factors consistent with DEP's for chemicals; consistent with the findings of the National Academies Biological Effect Ionizing Radiation Report, VII (BEIR VII); and set all exposure standards (for both radiation and non-radioactive toxic chemicals) to protect the most vulnerable among us- women, children, embryo.
- Determine if site is for restricted or unrestricted use ("greenfield")
- If site is for restricted use, require unrestricted clean up standard because contaminants will eventually end up in Cape Cod Bay due to the topography of the site.

### **Prohibit rubblelization**

Rationale:

- Contaminated rubble likely to leach into soil impacting groundwater and runoff to other locations both onsite and offsite.
- Water intrusion into the rubble is likely at Pilgrim due to proximity to the water table (groundwater table is typically at about 1' below mean sea level) and flooding.

- Potential excavation of contaminated building rubble and soil following decontamination of site for use later in new construction material or as fill, thus causing radiation exposures.
- Provides less stable surface than soil/sand due to inevitable spaces between rubble
- Constitutes a new low level radioactive waste facility at Pilgrim, but without NRC requirements to provide protections equivalent to off-site disposal facilities for low-level radioactive waste.

### **Public Safety**

- Retain current offsite emergency planning, funded by licensee, until spent fuel pool is emptied (Support H.1147, MA Legislature 2017)
- MDPH continue and expand offsite radiological monitoring and onsite monitoring of tritium and other radionuclides funded by Entergy. Support H. 1133, pending in the State House

### **Workers**

- Advocate for skilled workforce retained for decommissioning.
- Advocate to provide job training for workers let go.

### **NRC Oversight**

- Reinstate NRC inspections and oversight during decommissioning. Currently the NRC has little to no meaningful oversight during decommissioning. There are no resident inspectors and no regular inspections. Lack of NRC oversight means licensee compliance with regulations is impossible to verify and enforce on a timely basis. Lack of regular reporting leaves the public in the dark.

### **NEPA**

- Restore the National Environmental Policy Act (NEPA) compliance. Decommissioning is a major federal action and requires significant oversight, EPA participation, and public/state formal hearing rights

### **DCAP**

- One of the duties of the DCAP is "...to encourage community involvement in matters related to the decommissioning of the PNPS." Establish a procedure for communication between members of the public and members of DCAP so that any materials sent to DCAP will be distributed to all its members.
- Funding: Amend legislation to include funding to enable the DCAP to hire experts.

Submitted on behalf of the committee by,

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