

Congress of the United States

Washington, DC 20510

September 21, 2016

The Honorable Stephen G. Burns
Chairman
Nuclear Regulatory Commission (NRC)
Rockville, MD 20852

Dear Chairman Burns:

We write to urge the Commission to reject Entergy's request for an extension to comply with the post-Fukushima requirement to install hardened containment vents capable of operating under severe accident conditions at the Pilgrim Nuclear Power Station in Plymouth, MA. Entergy's request for an extension until December 31, 2019 would effectively exempt Pilgrim from NRC's requirement, as the reactor will be permanently shutting down no later than June 1, 2019. When Entergy announced its intention to cease operations at Pilgrim, the NRC stated that the closure "will not relieve [Entergy] of the responsibility of running that plant as safely as possible until the end of its life."¹ If approved, Entergy's proposal would run directly counter to that responsibility, as it would increase the risk of a containment failure and a catastrophic radioactive release in the event of a terrorist attack or severe accident.

Following the March 11, 2011 earthquake and tsunami that knocked out power at the Fukushima Daiichi nuclear power plant, cooling at the reactors failed and there was a dangerous build-up of hydrogen gas and steam. Under such circumstances, venting the containment can reduce pressure and mitigate the risk of a hydrogen explosion. However, if vents are not hardened and capable of operating in the event of a severe accident, they may become damaged, increasing the likelihood that containment fails and radioactive material is released into the environment. This is precisely what occurred at Fukushima, where vents became inoperable due to the loss of onsite power, resulting in a containment breach and release of radioactive material.

This experience led the Fukushima Near-Term Task Force — a group of experts with unparalleled experience in nuclear safety — to conclude that "a reliable hardened wetwell vent in BWR facilities with Mark I and Mark II containment designs would have a significantly [sic] safety benefit."² To fulfill the Task Force's recommendation, the Commission voted in March 2012 to require all operators of Mark I and Mark II boiling water reactors (BWRs) like Pilgrim — the same type of reactor as the ones that melted down in Fukushima — to install hardened containment vents. In June 2013, the Commission issued order EA-13-109, which further required that such vents be capable of operating under severe accident conditions. As the NRC stated, the Fukushima nuclear accident "reinforced the importance of reliable operation of containment vents for plants with Mark I and Mark II containments."³ By installing such vents, U.S. reactor operators would mitigate a significant risk to public safety.

¹ <http://www.capecodtimes.com/article/20151013/NEWS/151019754>

² Nuclear Regulatory Commission, "The Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," July 12, 2011, p. 41

³ <http://www.nrc.gov/docs/ML1314/ML13143A321.pdf>

Doing so is particularly important at Pilgrim, which the NRC has listed in "Column 4," the least safe of its operating reactor ratings. Pilgrim's poor safety record was one of the reasons why the entire Massachusetts Congressional delegation wrote to you in October 2015 requesting that the Commission ensure Pilgrim receives the utmost attention to safety and security for the remaining period of its operation.

In keeping with that goal, we once again urge you to reject Entergy's efforts to reduce safety requirements at Pilgrim. Notwithstanding its intention to shut down the plant, Entergy has a paramount responsibility to minimize the risk of catastrophic accidents similar to the one that occurred at Fukushima. Exempting Pilgrim from the NRC's safety requirements would allow Entergy to abdicate that responsibility, unjustifiably exposing Massachusetts communities to danger.

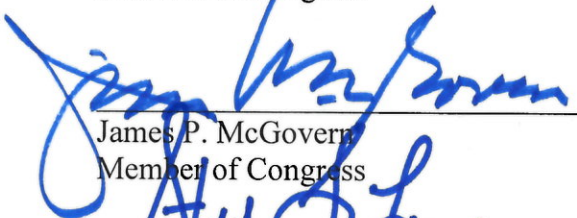
Sincerely,



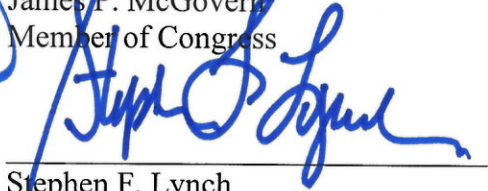
Edward J. Markey
United States Senator



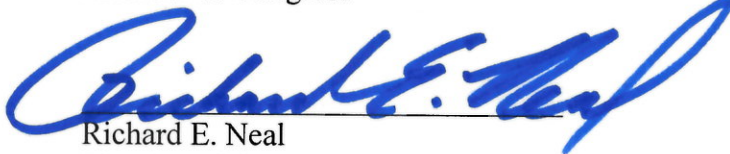
William R. Keating
Member of Congress



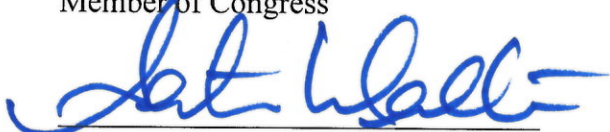
James P. McGovern
Member of Congress



Stephen F. Lynch
Member of Congress



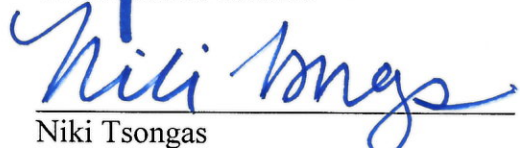
Richard E. Neal
Member of Congress



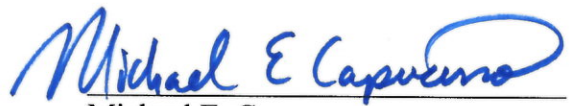
Seth Moulton
Member of Congress



Elizabeth Warren
United States Senator



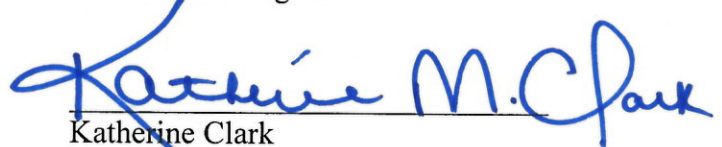
Niki Tsongas
Member of Congress



Michael E. Capuano
Member of Congress



Joseph P. Kennedy, III
Member of Congress



Katherine Clark
Member of Congress