



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

February 7, 2019

MEMORANDUM TO: File

FROM: John G. Lamb, Senior Project Manager
Special Projects and Process Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

A handwritten signature in black ink, appearing to read "John G. Lamb", is written over the "FROM:" line and extends to the right.

SUBJECT: TRANSCRIPT FOR PUBLIC MEETING HELD ON JANUARY 15, 2019,
IN PLYMOUTH, MASSACHUSETTS REGARDING SEABROOK
NUCLEAR POWER STATION POST-SHUTDOWN
DECOMMISSIONING ACTIVITIES REPORT AND LICENSE
TRANSFER APPLICATION (EPID L-2018-LLL-0031)

The purpose of this memorandum is to provide, and make available to the public, a corrected transcript associated with the public meeting held on January 15, 2019, in Plymouth, Massachusetts regarding the Pilgrim Nuclear Power Station (Pilgrim) Post-Shutdown Decommissioning Activities Report (PSDAR) and license transfer application (LTA). The original transcript is contained in Agencywide Documents Access and Management System Accession No. ML19029A025.

The enclosure contains the corrected transcript from the public Pilgrim PSDAR and LTA meeting. The transcript has been corrected based on review by the U.S. Nuclear Regulatory Commission staff. Areas where corrections were made to the original transcript are marked in square brackets and highlighted, with errors marked with strikethrough.

Docket No. 50-293

Enclosure:
Transcript of Public Meeting regarding
Pilgrim PSDAR and LTA

Official Transcript of Proceedings

NUCLEAR REGULATORY COMMISSION

Title: Public Meeting on Pilgrim Post-Shutdown
Decommissioning Activities Report

Docket Number: (n/a) [50-293]

Location: Plymouth, Massachusetts

Date: Tuesday, January 15, 2019

Work Order No.: NRC-0051

Pages 1-122

NEAL R. GROSS AND CO., INC.
Court Reporters and Transcribers
1323 Rhode Island Avenue, N.W.
Washington, D.C. 20005
(202) 234-4433

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

+ + + + +

PUBLIC MEETING ON PILGRIM POST-SHUTDOWN
DECOMMISSIONING ACTIVITIES REPORT

+ + + + +

TUESDAY,

JANUARY 15, 2019

+ + + + +

PLYMOUTH, MASSACHUSETTS

+ + + + +

The meeting was convened in Room A, Hotel
1620, 18 Water Street, Plymouth, MA, at 6:00 p.m.,
Bruce Watson, chairman, presiding.

NRC STAFF:

DONNA JANDA, Facilitator

BRETT KLUKAN, Facilitator

JOHN LAMB, Office of Nuclear Reactor Regulation

BRUCE WATSON, Office of Nuclear Material Safety and
Safeguards

ALSO PRESENT:

~~ANNETTE VIETTI COOK, Secretary of the Commission~~

~~MARIAN ZOBLER, General Counsel~~

CONTENTS

Call to Order and Opening Remarks	3
Bruce Watson	
NRC's Decommissioning Experience	5
Bruce Watson	
Pilgrim Decommissioning	
John Lamb	8
Mandy Halter	14
Andrea Sterdis	20
Comments from Elected Officials,	
Representatives of Elected Officials, or	
Representatives of Federally-Recognized Tribes	
Jessica Wong	27
Rory Clark	28
Michael Jackman	33
Seth Schofield	36
Mary Lampert	40
Jim Lampert	43
Rebecca Chin	45
Sheila Lynch-Benttinin	46
Public Comments	52
Closing Remarks	121
Adjourn	122

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
 1323 RHODE ISLAND AVE., N.W.
 WASHINGTON, D.C. 20005-3701

P R O C E E D I N G S

6:02 p.m.

MR. WATSON: Good evening. I'm Bruce Watson, Chief of the Reactor Decommissioning Branch in the Division of Decommissioning, Uranium Recovery, and Waste Programs, and will be chairing tonight's session.

Our purpose is to obtain your comments on the Entergy Post-Shutdown Decommissioning Activities Report [PSDAR] and the Holtec license application and the related Post-Shutdown Decommissioning Report associated with it.

I would like to highlight [U.S. Nuclear Regulatory Commission] NRC's mission to protect public health and safety, promote the common defense and security, and protect the environment, and our current work related to the regulatory requirements during the decommissioning of power plants.

I would like to introduce a few of the NRC staff who will be here to listen to your comments. And hopefully, we, the staff, can collectively answer questions on the decommissioning process. If we can't, we'll do our best to get back to you.

So, you've met Brett, our Region I Counselor, who will be facilitating tonight's

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 meeting, along with Donna Janda, also from Region I.
2 Also in attendance is John Lamb, the current Project
3 Manager for Pilgrim. Amy Snyder is here, who will
4 be the Decommissioning Project Manager when the plant
5 shuts down and is transferred over to our
6 organization.

7 Also in attendance is Mike Dusaniwsky,
8 our Senior Economist; Jason Piotter, Senior Engineer
9 in our Spent Fuel Management Group; Jessie Quintero,
10 our Environmental Review Specialist, and Ray Powell,
11 our Region I Branch Chief that will be inspecting the
12 plant during the decommissioning process. We also
13 have some additional folks in the audience that, if
14 we need to, we can call on them to help us with
15 comments or questions.

16 Next slide, please.

17 This is an NRC Category 3 public meeting
18 to obtain comments on the Entergy PSD[A]R and the
19 Holtec application and their supplemental PSD[A]R
20 that's with it. These documents were made publicly
21 available for comment.

22 The meeting is being transcribed and will
23 be made available for the public to review. There
24 will also be a meeting summary published for the
25 meeting.

1 We have a planned short presentation by
2 John Lamb, who will discuss the PSD[A]R process and
3 the license review process. Then, Entergy and Holtec
4 will be giving short presentations. Speaking for
5 Entergy tonight is Mandy Halter -- she is the Director
6 of Nuclear Licensing -- and Andrea Sterdis from
7 Holtec, who from also the Comprehensive
8 Decommissioning International, who is a Vice
9 President of Regulatory Programs, Environment and
10 Safety.

11 After those presentations, we will turn
12 the meeting over to Brett and Donna, who will begin
13 the process to allow speakers to provide comments.
14 It is my full intention, if we can, to end this
15 meeting at 9:00 p.m.

16 I also want to emphasize that this
17 meeting is to discuss the upcoming permanent shutdown
18 of the Pilgrim Plant and the decommissioning process
19 associated with it.

20 Next slide, please.

21 Now I want to just discuss a little bit
22 of our decommissioning experience. We have many
23 years of decommissioning experience. We have over
24 21 years' experience with our current decommissioning
25 regulations and have completed over 80 complex

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 material decommissionings and terminated those
2 licenses. They have all been released for
3 unrestricted use by the owner. So, they can be used
4 for any future purpose. And included in that 80 is
5 10 nuclear power plants.

6 Next slide, please.

7 On this slide is a picture of Yankee
8 Rowe. It's located here in Rowe, Massachusetts.
9 It's one of the 10 plants that was decommissioned.
10 We terminated the license in 2007. Pictured on the
11 left is the plant when it was in operation. Pictured
12 on the right is where the plant was greenfielded by
13 the utility associated with the requirements set up
14 with the State. The NRC does not require site
15 restoration as part of our process.

16 One of the things that I want to point
17 out to you is that, on the picture on the right there
18 is a hydroelectric dam that's been there for over 100
19 years. As you note, the nuclear plant operated, was
20 decommissioned, and is gone. However, on the hill
21 in the center there is a picture of the dry fuel
22 storage facility that is still located on their site
23 and under license, and will continue to be inspected
24 by our inspectors. Of course, the spent fuel is
25 there awaiting the final disposition of the high-

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 level waste disposal, either interim or final
2 repository, here in the U.S.

3 Next slide, please.

4 I wanted to just briefly discuss the two
5 decommissioning options discussed in the November
6 2004[1]8 submittals. Regardless of the option chosen,
7 preparation of the decommissioning takes about one to
8 two years to remove the radioactive waste stored
9 onsite, remove filters, resins; drain systems to
10 allow the dismantling to begin and be done safely or
11 placed in storage. After the decommissioning
12 preparation period, the licensee can go into either
13 DECON or SAFSTOR.

14 DECON, or a prompt decommissioning, the
15 licensee begins the decommissioning activities and
16 usually transfer the spent fuel to dry storage. Past
17 experience has shown that decommissioning typically
18 takes seven to ten years to complete.

19 With SAFSTOR, the plant is placed in
20 storage -- we like to call it, it's cold and
21 dark -- until the licensee decides to dismantle and
22 decommission the plant. In SAFSTOR, the NRC will
23 continue to inspect the plants at least annually and
24 more frequently when decommissioning activities are
25 performed.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Regardless of the decommissioning option
2 chosen, the NRC regulations require that the
3 decommissioning be completed in 60 years.

4 Next slide, please.

5 A few reminders. We are here to listen
6 to your comments on the Pilgrim decommissioning.
7 This is part of the process we've set up and it's
8 intended to hear your comments, so we can consider
9 those in our review of both the PSD[A]R from Entergy
10 and, also, the license application and the PSD[A]R
11 that supplements it from Holtec.

12 The meeting, again, is being transcribed,
13 and the transcript will be publicly available. A
14 meeting summary will be published and would be
15 publicly available.

16 And we will do our best to answer your
17 questions, where we can. There's going to be
18 possibly some that we can't answer, but we do our
19 best to get back to you.

20 I'm going to introduce John. John Lamb
21 is going to sit down and speak.

22 MR. LAMB: Yes.

23 MR. WATSON: Okay. Thank you.

24 MR. LAMB: Hi. Good evening. My name
25 is John Lamb. I am the Project Manager for Pilgrim

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 at NRC Headquarters in Rockville. I've been working
2 for the NRC for 19 years, and prior to that, I worked
3 15 years in the power plant.

4 Next slide, please.

5 In accordance with the NRC regulations,
6 a Post-Shutdown Decommissioning Activities Report, or
7 PSDAR, must be submitted to the NRC, and a copy to
8 the Commonwealth of Massachusetts, prior to or within
9 two years following the permanent cessation of
10 operations of Pilgrim. Entergy submitted the Pilgrim
11 PSDAR on November 16th, 2018.

12 A PSDAR must contain a description of the
13 planned decommissioning activities, along with a
14 schedule for their accomplishment and a site-specific
15 decommissioning cost estimate, including the
16 projected cost of managing irradiated fuel.

17 The NRC staff uses a Regulatory Guide
18 that provides guidance on the content and format of
19 PSDARs. The Regulatory Guide is available to the
20 public as noted on this slide.

21 Decommissioning activities must not
22 endanger the public health and safety or result in
23 significant environmental impacts not previously
24 reviewed.

25 Next slide.

1 A PSDAR must contain a discussion that
2 provides the reasons for concluding that the
3 environmental impacts associated with site-specific
4 decommissioning activities will be bounded by
5 appropriate previously-issued Environmental Impact
6 Statements. Therefore, during the environmental
7 review of a PSDAR, the NRC uses various previous staff
8 reports to determine whether the environmental
9 impacts from decommissioning are bounded by these
10 reports. For instance, for Pilgrim, the NRC staff
11 will use a generic Environmental Impact Statement
12 regarding decommissioning and will also look at
13 previous Environmental Impact Statements developed
14 specifically for Pilgrim, such as the Environmental
15 Impact Statement developed for the renewal of the
16 Pilgrim operating license. The NRC staff will also
17 rely on findings from its inspection program.

18 Next slide, please.

19 The request for comment and meeting
20 notice for the Pilgrim PSDAR was published in The
21 Federal Register on December 21st, 2018. The 90-day
22 comment period ends on March 21st, 2019.

23 The NRC staff will notify the licensee if
24 the staff needs additional information to support its
25 review of the PSDAR. The NRC staff will document its

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 PSDAR review in a letter to the licensee and will
2 address the comments received during the comment
3 period.

4 After the submission of the Pilgrim
5 PSDAR, the NRC regulations require that Entergy shall
6 notify the NRC in writing and send a copy to the
7 Commonwealth of Massachusetts before performing any
8 decommissioning activity inconsistent with or making
9 a significant schedule change from those actions and
10 schedules described in the PSDAR.

11 Next slide, please.

12 By letter dated November 16[t]h, 2018,
13 Entergy and Holtec submitted a license transfer
14 application requesting that the license for Pilgrim
15 be transferred from Entergy to Holtec. Before this
16 transfer may be completed, the NRC must determine
17 that Holtec is qualified to be the holder of the
18 Pilgrim license.

19 In order to make this determination, the
20 NRC staff reviews the following five areas:
21 financial qualifications; decommissioning funding
22 assurance; foreign ownership, control, and
23 domination; technical qualifications, and insurance
24 and indemnity. If the NRC finds that Holtec is
25 qualified in these areas, then it would approve the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 license transfer by an order and issue a conforming
2 license amendment.

3 Next slide, please.

4 License transfer applications are
5 noticed in The Federal Register, and the public can
6 request a hearing and/or provide comments on the
7 application. The ~~program~~ [Pilgrim] license transfer
8 application is ready for publication in The Federal
9 Register. However, The Federal Register is currently
10 impacted by the partial federal government shutdown.
11 Therefore, the Pilgrim license transfer federal
12 registration notification will not be published until
13 after the partial federal government shutdown ends.
14 Once this Federal Register notice is published, there
15 will be a 20-day hearing period, and then, a 30-day
16 comment period.

17 License transfer applications typically
18 contain proprietary information. A redacted,
19 nonproprietary version of the Pilgrim license
20 transfer application is available to the public and
21 can be found online through the NRC's electronic
22 library called ADAMS. The proprietary version can
23 be requested using a process that will be described
24 in The Federal Register notice.

25 Next slide, please.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 By letter dated November 16th, 2018,
2 Holtec submitted a proposed revised PSDAR for
3 Pilgrim. The Holtec PSDAR is a supplement to the
4 license transfer application, and therefore, is part
5 of the license transfer application action, and not
6 part of the Entergy PSDAR action. The Holtec PSDAR
7 is contingent upon the approval of the licensed
8 transfer application and the equity sale closure.
9 For purposes of this public meeting, the NRC will be
10 accepting comments on both the Entergy PSDAR action
11 and the license transfer application, which includes
12 the proposed Holtec PSDAR.

13 Next slide, please.

14 Holtec also submitted a request for an
15 exemption from the NRC's Decommissioning Trust Fund
16 requirements in an enclosure to the license transfer
17 application. If this request were to be granted,
18 then Holtec would be allowed to use the Pilgrim
19 Decommissioning Trust Fund not only for radiological
20 decommissioning expenses, but also for expenses
21 related to spent fuel management activities and site
22 restoration activities. Like the Holtec PSDAR, this
23 exemption request is contingent upon the approval of
24 the license transfer application and the equity sale
25 closure.

1 Next slide, please.

2 Comments regarding the Entergy PSDAR can
3 be submitted on regulations.gov website under Docket
4 ID NRC-2018-0286 until March 21st, 2019. Comments
5 regarding the license transfer application can be
6 submitted during tonight's public meeting. Once the
7 license transfer application is noticed in The
8 Federal Register, then comments can be submitted on
9 the regulations.gov website under Docket ID
10 NRC-2018-0279 for a period of 30 days for comments,
11 and a hearing can be requested for a period of 20
12 days.

13 Next slide, please.

14 This slide shows where to mail comments
15 regarding Entergy PSDAR or the license transfer
16 application. Please remember to use the Docket ID
17 associated with each application.

18 That concludes my presentation. I'll
19 turn it back over to Bruce.

20 MR. WATSON: Okay. Our next speaker is
21 Mandy Halter from Entergy.

22 MS. HALTER: Good evening. My name is
23 Mandy Halter, and I'm the Director of Nuclear
24 Licensing for Entergy Nuclear. With me tonight is
25 Mike Twomey, the Vice President of External Affairs

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 for Entergy Wholesale Commodities. I appreciate the
2 opportunity to be here tonight to provide you
3 information on Entergy's plans to decommission the
4 Pilgrim Nuclear Power Station.

5 2019 is a significant year for Entergy,
6 for Pilgrim, and for this area. On May 31st of this
7 year, Pilgrim will permanently cease power
8 operations. In June, we will certify to the NRC that
9 the reactor is permanently shut down and defueled.
10 Also in June, Pilgrim will complete its first
11 staffing reduction, as we transition the
12 organizational structure to support Pilgrim's SAFSTOR
13 decommissioning plan. Throughout the final months
14 of plant operation, and as we transition to
15 decommissioning, we remain committed to safety,
16 health, and security of the plant, its employees, and
17 you, the public.

18 Next slide. Next slide, please. Thank
19 you.

20 The Entergy Post-Shutdown
21 Decommissioning Activities Report, or PSDAR, was
22 submitted to the NRC on November 16th, 2018, and
23 outlines our plan to use the SAFSTOR decommissioning
24 strategy. Our PSDAR was prepared by a team of
25 experts, in accordance with regulations, NRC

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 guidance, and a thorough review of PSDARs submitted
2 to the NRC by plants in decommissioning.

3 The Pilgrim PSDAR contains a description
4 of our planned decommissioning activities as well as
5 a schedule for their completion, an estimate of the
6 cost, and a discussion of the environmental impacts
7 of these activities. And I will provide more
8 information in the following slides.

9 Next slide, please.

10 The majority of the dormancy period of
11 our SAFSTOR plan will involve all spent fuel in dry
12 fuel storage. This slide shows our plan to achieve
13 the dry fuel storage [dormancy] ~~storm and sea~~ state
14 by the end of 2022. Along the way, Pilgrim will make
15 adjustments to its staffing levels and the emergency
16 plan, in accordance with appropriate regulatory
17 approvals, based on the status of the fuel and the
18 corresponding decreasing risk of offsite radiological
19 consequences from an accident.

20 Next slide, please.

21 Under the SAFSTOR methodology, we will
22 maintain and monitor Pilgrim in a dormancy period to
23 allow for the radioactive decay of the plant,
24 followed by the dismantlement and decontamination to
25 permit NRC license termination within 60 years, as

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 required by regulations. Under Entergy's plan,
2 radiological decontamination and dismantlement will
3 occur safely by the year 2079. We plan to restore
4 the site following license termination.

5 Next slide, please.

6 In accordance with regulations, we
7 developed a site-specific estimate of the costs for
8 the planned SAFSTOR decommissioning activities at
9 Pilgrim. This cost estimate was developed by a
10 leading expert using up-to-date and best available
11 data. In addition to estimating the costs associated
12 with license termination, we also estimated the cost
13 associated with spent fuel management and site
14 restoration. Our SAFSTOR decommissioning cost
15 estimate for Pilgrim is included as an attachment to
16 the Entergy PSDAR.

17 Next slide, please.

18 The site-specific decommissioning cost
19 estimate submitted to the NRC in November 2018 was
20 reported using 2018 dollars and up-to-date 2018
21 pricing information. The total estimated cost
22 associated with license termination as well as spent
23 fuel management and site restoration for Pilgrim is
24 \$1.66 billion. We will periodically update the
25 decommissioning cost estimate throughout the SAFSTOR

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 period, in accordance with regulations.

2 It is very important to note that we are
3 required by regulation, as the owner of the plant, to
4 demonstrate reasonable assurance that there are
5 adequate funds available to cover the cost of license
6 termination. We provide this funding for Pilgrim
7 through a Nuclear Decommissioning Trust Fund, which,
8 as reported to the NRC and the PSDAR, was funded at
9 \$1.05 billion at the end of October 2018. Accounting
10 for the growth of these funds over time, as permitted
11 by NRC methodology, the Pilgrim nuclear
12 decommissioning trust balance does not provide
13 financial assurance for the decommissioning costs of
14 our SAFSTOR plan.

15 Next slide, please.

16 We have concluded that the environmental
17 impacts associated with planned SAFSTOR
18 decommissioning activities at Pilgrim are less than,
19 and are bounded by, impacts addressed in previously-
20 issued Environmental Impact Statements. A more
21 detailed discussion of the reasons for our conclusion
22 is included in the PSDAR.

23 Next slide, please.

24 In November 2018, we filed an updated
25 Pilgrim Spent Fuel Management Plan with the NRC which

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 outlines our intent to store all spent fuel on a new,
2 larger, independent spent fuel storage installation
3 pad which will be located at a higher elevation on
4 the program site. This pad, which we plan to
5 construct by the end of 2020, will store a total of
6 61 casks, including the 17 casks that are on the
7 current pad, as well as 44 additional casks which are
8 needed to store the fuel that is currently in the
9 reactor vessel and the spent fuel pool.

10 Next slide, please.

11 In November 2018, Entergy and Holtec
12 submitted a request to the NRC to transfer the control
13 of Pilgrim's plant and [Independent Spent Fuel
14 Storage Installation] ISFSI licenses from Entergy to
15 Holtec. If approved by the NRC, the license transfer
16 will allow for prompt decommissioning under Holtec's
17 plan, which is different than Entergy's plan.
18 Specifically, Holtec plans to decommission Pilgrim
19 using a DECON or immediate dismantlement strategy by
20 approximately 2024. Additionally, Holtec intends to
21 move all spent fuel to dry fuel storage on the new
22 pad by the end of 2021. Following this presentation,
23 Andrea Sterdis will provide more information on
24 Holtec's decommissioning plans for Pilgrim.

25 A major benefit of decommissioning under

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 Holtec's plan is that it will allow for earlier
2 release of portions of the Pilgrim site for reuse.
3 We have requested that the NRC review and approve the
4 license transfer application by May 31st of this
5 year. We know that this is an aggressive review
6 schedule for the staff and we are certain that the
7 NRC will conduct a very diligent review, and we expect
8 nothing less. The intent behind this requested
9 timeline is to provide certainty to the plant
10 employees and to the citizens of Plymouth and the
11 surrounding areas on plant ownership as well as the
12 decommissioning plan and timeline following plant
13 shutdown.

14 Next slide, please.

15 More information about Pilgrim's plans
16 for decommissioning as well as our related submittals
17 that we have provided to the NRC are publicly
18 available on our website, www.pilgrimpower.com.

19 I thank you for your time. And a number
20 of us are here from Entergy, and we look forward to
21 answering your questions later in the evening. Thank
22 you.

23 MR. WATSON: Thank you for your
24 presentation.

25 Our next presentation is by Andrea

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Sterdis from Holtec International and CDI, I believe
2 it's called.

3 MS. STERDIS: Thank you, Bruce.

4 Good evening. I really appreciate the
5 opportunity to provide you all with a brief overview
6 of the Post-Shutdown Decommissioning Activities
7 Report that has been prepared to show the Holtec plan
8 for initiating plant decommissioning following NRC
9 approval of the license transfer application,
10 execution of the license transfers, and completion of
11 the sale closure.

12 Next slide, please.

13 On this slide, you can see that I am up
14 here providing the presentation. I'm Andrea Sterdis.
15 I'm the Vice President for Regulatory Programs,
16 Environment and Safety for Comprehensive
17 [De]Commissioning International. I am joined
18 tonight by Joy Russell, Senior Vice President for
19 Holtec International.

20 Next slide.

21 On November 16th, 2018, Holtec submitted
22 a revised Post-Shutdown Decommissioning Activities
23 Report, or PSDAR, based on their plan to initiate
24 prompt DECON. Our PSDAR for DECON includes a
25 description of the planned activities, specifically

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 the activities that are required to initiate that
2 prompt DECON and complete it. It also includes a
3 planned DECON decommissioning schedule and a cost
4 estimate reflecting that schedule and the DECON plan.
5 Lastly, it includes a discussion of the environmental
6 impacts for the specific activities that will be
7 performed during the execution of the dismantlement
8 and the waste removal from the site to complete the
9 radiological decommissioning.

10 The PSDAR was prepared in accordance with
11 NRC regulations and addresses NRC guidance. It was
12 prepared by a team that is experienced in planning,
13 estimating, and executing nuclear power plant
14 decommissioning. It was also informed by a review
15 of previously-submitted PSDARs, as well as
16 particularly a review and an alignment with the
17 assumptions that were provided and used in the
18 Entergy SAFSTOR PSDAR. The DECON PSDAR is contingent
19 upon NRC approval of the license transfer, execution
20 of the transfers of the license, and completion of
21 the sale.

22 Next slide, please.

23 The DECON PSDAR reflects Holtec's plan to
24 promptly start decommissioning activities following
25 the license transfer and sales closure. The schedule

1 reflects the project goal to achieve partial site
2 release within eight years.

3 The decommissioning cost estimate
4 reflects DECON activities and schedule for completing
5 radiological decommissioning, managing the spent
6 fuel, and completing site restoration activities.

7 The environmental evaluation considers
8 the DECON activities and provides evidence that those
9 activities are bounded by the existing Environmental
10 Impact Statements that are applicable to the Pilgrim
11 site, including the NRC generic Environmental Impact
12 Statement for Decommissioning as well as the Pilgrim
13 Site License Renewal Environmental Impact Statement.

14 If you look at the SAFSTOR PSDAR and
15 compare the decommissioning cost estimate with that
16 provided in our PSDAR for DECON, you will see some
17 differences. Those differences are primarily driven
18 by two reasons. First, the core business for Entergy
19 in the current time is to provide and generate
20 power/electricity. The core business for Holtec,
21 including CDI, is managing spent fuel and executing
22 decommissioning projects. And therefore, the Holtec
23 team has the latest technology, the engineering
24 expertise, and the project management expertise to
25 apply cost- and time-effective methods for

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 decommissioning, resulting in a difference in the
2 decommissioning cost.

3 In addition, the DECON plan eliminates
4 the transition to the dormant state, maintaining that
5 plant dormant state for almost 40 years, and the
6 transition to reactivate the plant and complete the
7 dismantlement and waste removal activities about 40
8 years down the road.

9 It's important to note that the SAFSTOR
10 dismantlement and waste removal schedule and the
11 DECON dismantlement and waste removal schedule are
12 similar in duration. The difference is the prompt
13 DECON one modeled in our PSDAR is initiated
14 immediately after license transfer in 2019 and
15 completes in approximately five years.

16 On the next slide, please.

17 The schedule provided in the DECON PSDAR
18 assumes that the NRC will approve the license
19 transfer application in time to support a July 31st
20 transfer of the licenses and sale closure. This
21 slide provides some key assumptions that drove the
22 schedule that's included in that PSDAR, starting with
23 the fact that we've assumed an initiation of
24 decontamination and dismantlement activities in 2019
25 following the license transfer. It also assumes that

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 the newest ISFSI pad construction is completed and
2 the pad is available for use in 2020. It assumes
3 that the offloading of the spent fuel transitioning
4 the site from a combined wet and dry spent fuel
5 storage site to a dry fuel storage site only occurs
6 by the fourth quarter of 2021.

7 Similar to the SAFSTOR PSDAR schedule
8 submitted by Entergy, our DECON PSDAR schedule
9 assumes that the [Department of Energy] DOE completes
10 the spent fuel removal from the site in the 2062 time
11 period. The DECON PSDAR schedule shows radiological
12 decommission, except for the independent spent fuel
13 storage installation, ISFSI, is accomplished within
14 approximately five years following the license
15 transfer and sale closure. It also assumes that site
16 restoration activities, which are not required for
17 the partial site release approval by the NRC, are
18 continuing beyond that approximately one year.

19 Next slide, please.

20 The Holtec DCE, or decommissioning cost
21 estimate, that's included in the DECON PSDAR results
22 in approximately \$1.134 billion cost in 2018 dollars.
23 The Nuclear Decommissioning Trust Fund for Pilgrim is
24 currently valued at \$1.05 billion as of October 31st,
25 2018. The cash flow analyses that were submitted as

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 part of the license transfer application as well as
2 the DECON PSDAR and decommissioning cost estimate
3 demonstrate that the Pilgrim Nuclear Decommissioning
4 Trust Fund contains sufficient funds to cover our
5 plan for radiological decommissioning, spent fuel
6 management, and site restoration.

7 It's important to note that, pursuant to
8 NRC regulations, we will be required, as the
9 licensee, to prepare and submit an annual report that
10 provides the Nuclear Decommissioning Trust [NDT] Fund
11 status, including expenses and activities executed in
12 the previous year, the remaining NDT balance, and
13 showing financial assurance that the balance can
14 address and cover the remaining costs of all the
15 activities required to complete the license
16 termination. This is a public report and is made
17 available each year by the NRC.

18 With that, I'd like to thank you for your
19 time, and I'd like to thank the NRC for this meeting.
20 Thank you.

21 MR. WATSON: Thank you, Andrea.

22 Before I turn the meeting over to Brett
23 and Donna to facilitate the comment session, I would
24 like to invite any elected officials or their
25 representatives or any Native American tribe

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 representations to make statements if you're
2 available now. So, if you would, those that are
3 interested, please come up to the microphone and
4 state your name for the record.

5 MR. KLUKAN: So, we actually have a
6 couple who have preregistered with us, and we are
7 going to go down through that list. And then, we'll
8 open it up to those who did not preregister.

9 So, first up, we're going to have Ms.
10 Jessica Wong from the Office of Senator Elizabeth
11 Warren.

12 MS. WONG: Good Evening. Thank you. As
13 Brad said, my name is Jessica. I am from Senator
14 Elizabeth Warren's office, and I'm her Regional
15 Director.

16 So, Senator Warren reiterates her deep
17 concerns with the consistently poor public safety
18 record at Pilgrim Nuclear Power Station and the
19 Nuclear Regulatory Commission's pattern of ignoring
20 critical discrepancies in Entergy's safety measures
21 that put Massachusetts residents at risk. This
22 cannot continue, especially as the NRC reviews the
23 license transfer for the decommissioning from Entergy
24 to Holtec International. To date, she has sent six
25 letters to the NRC expressing these concerns, most

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 recently in October, following the reports of
2 unplanned shutdowns due to problems with equipment.

3 Entergy cannot continue to use the
4 summer's planned shutdown as an excuse to avoid much-
5 needed safety upgrades that protect our communities.
6 Senator Warren urges the company to prioritize the
7 people of southeastern Massachusetts over its
8 profits.

9 Similarly, the NRC can no longer shirk
10 its responsibilities to establish and enforce proper
11 safety standards. The Senator, once again, calls on
12 the NRC to require Entergy to immediately comply with
13 federal safety standards, and if they refuse to do
14 so, then the NRC must take necessary steps to shut
15 down the plant.

16 Thank you.

17 MR. KLUKAN: Thank you very much.

18 Next, we will have Ms. Rory Clark from
19 the Office of Senator Ed Markey.

20 MS. CLARK: Thank you for having me. As
21 you said, I'm Rory Clark. I'm Senator Markey's
22 Regional Director. I'll be reading a statement on
23 Senator Markey's behalf.

24 "I've long been concerned about Pilgrim's
25 safety and operating record and its management's

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 history of cutting corners at the expense of
2 increased risk to Massachusetts residents. As we
3 turn our attention now to the details of the Post-
4 Shutdown Decommissioning Activities Reports
5 submitted by Entergy and Holtec International, I must
6 remind the Nuclear Regulatory Commission, Entergy,
7 and Holtec that the people of Massachusetts will
8 settle for nothing less than the most stringent
9 safety measures.

10 "As the federal regulatory body
11 overseeing the decommissioning process, we all expect
12 the NRC will review both Entergy and Holtec's
13 proposed decommissioning plans with the utmost of
14 care and caution. The safety of Massachusetts
15 residents demands this thorough review.

16 "Plans for the ownership and
17 decommissioning of Pilgrim must prioritize safety ~~and~~
18 [and] security. The NRC must evaluate both Entergy
19 and Holtec's PSDARs to ensure that each provides a
20 comprehensive accounting of how that owner will
21 assume responsibility for safe operations, improve
22 upon the abysmal safety record at Pilgrim, and
23 finance the complete decommissioning process.

24 "I understand that it's common practice
25 for the NRC to issue exemptions that would limit the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 required emergency planning zone when the plant
2 begins the decommissioning process, but I must urge
3 the NRC to require Pilgrim's owner, be it Entergy or
4 Holtec, to work with local communities to maintain
5 and fund the significant emergency planning zone and
6 ensure that local communities are prepared for any
7 eventuality.

8 "Last year I was proud to cosponsor the
9 Safe and Secure Decommissioning Act which would
10 prohibit the NRC from issuing waivers or granting
11 exemptions from complying with safety and emergency
12 preparedness regulations put forth in the Atomic
13 Energy Act of 1954 until nuclear fuel had been
14 transferred to spent nuclear fuel dry casks. I will
15 continue to push for all parties involved in the
16 decommissioning of Pilgrim to abide by such
17 standards.

18 "As we are all aware, this region is home
19 to fierce nor'easter storms and rising tides, posing
20 safety concerns that other nuclear facilities around
21 the country do not have to contend with. Especially
22 given this region's harsh environmental conditions,
23 the NRC should ensure the completion of a full
24 National Environmental Policy Act analysis that would
25 exam the effect of the proposed decommissioning plans

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 on the environment and allow for additional public
2 involvement.

3 "Furthermore, any Pilgrim licensee
4 should provide thorough plans for communicating
5 regularly with the public and local stakeholders
6 throughout the decommissioning process. This
7 communication is essential to ensure that all members
8 of the community understand how Pilgrim will be
9 safely decommissioned and foster confidence that
10 security measures satisfy federal safety standards
11 and community expectations.

12 "I was proud to be an original cosponsor
13 of additional legislation in 2018 entitled 'The
14 Nuclear Plant Decommissioning Act,' which would
15 ensure the states and local communities have a
16 meaningful role in the crafting and preparation of
17 decommissioning plans for retired nuclear plants
18 located in our community. This bill also requires
19 the NRC to publicly and transparently approve or
20 reject every proposed decommissioning plan, which it
21 currently is not required to do.

22 "I will be introducing the Dry Cask
23 Storage Act this session, which would ensure every
24 nuclear reactor operator must be compelled to comply
25 with an NRC-approved plan that would require the safe

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 removal of spent nuclear fuel from spent nuclear fuel
2 pools and placed that fuel into dry cask storage
3 within seven years of the time that the plan is
4 submitted to the NRC. This bill would further
5 provide funding to help reactor licensees implement
6 these plans and would expand the emergency planning
7 zone for all noncompliant reactor operators to 50
8 miles.

9 "As we consider tonight the shutdown
10 process for Pilgrim, Entergy and Holtec must provide
11 conclusive proof that there are sufficient funds
12 available in the Nuclear Decommissioning Trust to
13 decommission Pilgrim in a safe and secure manner. It
14 will be unacceptable for Entergy or Holtec to demand
15 additional money from Massachusetts ratepayers to
16 complete the decommissioning process at Pilgrim.
17 There can be no second chances here.

18 "Historical data and NRC guidelines
19 indicate that the decommissioning costs are likely to
20 increase faster ~~that~~ [than] inflation. Entergy and
21 Holtec must each account for that fact or find a way
22 to clearly rebut it. Given the amount currently
23 available in the Trust Fund, the NRC must carefully
24 assess if the proposed decommissioning timeline is
25 achievable in a safe and secure manner and require

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 there is reasonable public assurance of available
2 funds for the totality of the process. Additionally,
3 as the proposed license transfer will further strain
4 the NRC's resources, it is imperative that the NRC
5 assign additional staff to work on these issues and
6 charge the licensees for their salaries.

7 "In the recent past, I have also
8 expressed my concerns to the NRC regarding the draft
9 decommissioning rule currently awaiting review, which
10 is intended to provide clear guidelines for all
11 plants that are undergoing the decommissioning
12 process. This proposal falls far short of the NRC's
13 stated goals of providing for a safe, effective, and
14 efficient decommissioning process for nuclear plants.
15 In its current form, this fails to propose a
16 comprehensive set of decommissioning and cleanup
17 regulations, would result in the automatic approval
18 of facilities' exemptions from safety, security, and
19 emergency planning regulations, and would continue to
20 rubberstamp the industry's Post-Shutdown
21 Decommissioning Activities Report. I continue to
22 urge the NRC to reject this draft and, instead, write
23 a rule that will affirmatively guide plants and
24 communities through the decommissioning process.

25 "Thank you."

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 MR. KLUKAN: Thank you very much.

2 Next, we will have Mr. Michael Jackman of
3 the Office of Congressman Bill Keating.

4 MR. JACKMAN: Thank you.

5 I do have a statement from the
6 Congressman I'd like to read, but before I do that,
7 I have just some housekeeping questions. The slide
8 presentations that were made tonight, are those
9 available online or will they be available online?

10 MR. KLUKAN: For the record, yes, they
11 will be available online on the NRC's website.

12 MR. JACKMAN: Okay. Only because I
13 think if people want to make comments both on the
14 PSDAR and the license transfer, there's a lot of good
15 information in there. Thank you.

16 "Thank you for the opportunity to address
17 you at tonight's public meeting. Unfortunately, the
18 House voting schedule prevents me from being here in
19 person, but I wanted to restate my opinion that, as
20 we draw closer to the cessation of operations at
21 Pilgrim, the rigorous scrutiny of the operations at
22 the plant must continue. Entergy must not be allowed
23 to languish in column 4, representing the minimum
24 level of operational safety for the remainder of its
25 life as a power generating plant.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 "In addition, the NRC must scrutinize
2 Entergy's and Holtec's Post-Shutdown Decommissioning
3 Activities Reports to ensure that the health and
4 safety of Massachusetts residents is not at risk.
5 The NRC must enforce its regulations and require the
6 licensee to adhere to the most stringent standards
7 for facility security, cybersecurity for all the
8 plant systems, structural integrity of the onsite dry
9 cask storage system, and mitigation of environmental
10 hazards.

11 "In addition, decommissioning activities
12 must be fully funded by the licensee, and the NRC
13 must do all it can to ensure that taxpayers, be they
14 residents of Plymouth, the Commonwealth of
15 Massachusetts, or the United States of America, are
16 not left to shoulder the burden of the cost of the
17 cleanup of the Pilgrim site.

18 "Given the real prospect of ongoing
19 nuclear waste storage here in Plymouth, it is
20 incumbent upon all levels of government to work
21 together to ensure the safety of our residents. It
22 is imperative that those residents and residents of
23 all affected communities in Plymouth County, the
24 Cape, and the islands are included in the discussion
25 and decisions involved with the decommissioning

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 process.

2 "The Plymouth Town Select Board, the
3 State legislative delegation, the Nuclear
4 Decommissioning Citizens Advisory Panel, private
5 groups like Pilgrim Watch and Cape Downwinders, and
6 many other concerned individuals and groups, all have
7 been engaged in this vital discussion over the years,
8 and they all deserve to have their input heard and
9 incorporated into the decisionmaking process. I am
10 proud to have cosponsored legislation, which I've
11 already referred to, the Nuclear Plant
12 Decommissioning Act, that will do just that.

13 "I applaud all those present tonight for
14 sharing their perspectives, and I will continue to
15 fight to make sure that your voices are heard. Thank
16 you."

17 MR. KLUKAN: Thank you very much.

18 Next, we will have Mr. Seth Schofield
19 from the Massachusetts Attorney General's Office.

20 MR. SCHOFIELD: Thank you, Brett.

21 Good evening. I'm Seth Schofield,
22 Senior Appellate Counsel and Assistant Attorney
23 General in the Energy and Environment Bureau of the
24 Office of Attorney General Maura Healey.

25 First, I'd like to thank the Nuclear

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Regulatory Commission for coming to Plymouth tonight,
2 so that the public has an opportunity to voice their
3 thoughts and concerns about the power plant and the
4 proposed plans to decommission the plant following
5 its shutdown this spring.

6 From the Attorney General's perspective,
7 the proposed sale of Pilgrim and the related transfer
8 of Pilgrim's operating license from Entergy to a
9 Holtec subsidiary raise significant health, safety,
10 environmental, and financial concerns for the
11 Commonwealth and its citizens. We appreciate the
12 potential benefits of accelerated decommissioning
13 that forms the basis for the sale and license transfer
14 application, but we currently have serious concerns
15 about whether Pilgrim's Decommissioning Trust Fund
16 contains sufficient funds to cover the performance of
17 all necessary decommissioning, site restoration, and
18 spent fuel management activities on an indefinite
19 basis.

20 As currently proposed, neither Holtec,
21 Pilgrim, LLC, the proposed licensee, nor Holtec
22 Decommissioning International, LLC, the proposed
23 licensed operator, will generate any revenue or bring
24 with them any new assets that could be used to fund
25 and complete site decommissioning, restoration, and

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 spent fuel management activities at the site.
2 Instead, Holtec-Pilgrim and Holtec Decommissioning
3 International's only planned source of funds are the
4 funds currently existing in the Pilgrim Trust Fund,
5 and as currently proposed, there exists no guaranteed
6 add to the parent company of those two single-purpose
7 limited liability companies to compensate for any
8 funding shortfall in the Trust Funds. If there are
9 insufficient funds in the Trust Fund, Holtec would
10 likely default on its obligation and likely leave the
11 Commonwealth and its taxpayers with those
12 obligations, both as the payer of last resort and the
13 party responsible for protecting public safety and
14 the environment for an indefinite period.

15 Based on our preliminary review of the
16 license transfer application and the revised Post-
17 Shutdown Decommissioning Activities Report, we have
18 reason to believe that a Trust Fund shortfall could
19 very well occur. For example, Holtec's estimate of
20 what it will cost to decommission, restore, and
21 manage spent fuel at the site is only \$3.615 million
22 less than the total amount of money expected to be in
23 the trust. That means there would be insufficient
24 funds to cover any cost overrun in excess of \$3.6
25 million.

1 Past experience, however, including
2 decommissioning experience at other sites in New
3 England, demonstrates that the potential discovery of
4 previously unidentified radiological and non-
5 radiological contamination, potential unanticipated
6 work delays, and other potential problematic events
7 could well drive costs significantly beyond
8 preliminary post-shutdown decommissioning cost
9 estimates.

10 For example, the discovery of
11 strontium-90 during decommissioning at Connecticut
12 Yankee doubled the anticipated decommissioning cost
13 there. The discovery of highly contaminated
14 groundwater during decommissioning at Maine Yankee
15 also increased costs beyond those anticipated to
16 decommission that site. And the discovery of
17 [polychlorinated biphenyl] PCB
18 contamination/radiological groundwater contamination
19 during decommissioning at Yankee Rowe, similarly,
20 caused significant and unanticipated cost increases.

21 Holtec and its partner, SNC-Lavalin, have
22 poor track records on other projects at other sites
23 around the country, which amplifies the
24 Commonwealth's concerns about the potential for cost
25 overruns, delays, and other issues that will both

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 imperil public safety and our environment, while at
2 the same time enhancing the risk of a Trust Fund
3 shortfall that would make matters even worse. For
4 example, the NRC just recently issued a Notice of
5 Violation related to Holtec's mishandling of dry cask
6 loading and transfer operations at San Onofre Nuclear
7 Generation Station in California, and its failure to
8 timely report that matter to the NRC.

9 Because of the significant risk to the
10 Commonwealth embodied by the pending license transfer
11 proposal, we implore the NRC to join us in ~~closing~~
12 [closely] scrutinizing the proposal's terms and
13 ensure that substantial financial assurances exist to
14 ensure that those risks are fully addressed. To that
15 end, the Attorney General intends, on behalf of the
16 Commonwealth of Massachusetts, to intervene in the
17 pending license transfer proceeding to articulate
18 these and other concerns for evaluation by the
19 Commission and the imposition of protective
20 safeguards and other conditions with respect to any
21 license transfer.

22 Thank you.

23 MR. KLUKAN: Thank you very much.

24 Next up, we have several authorized
25 representatives from the Board of Selectmen of the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Town of Duxbury.

2 MS. M. LAMPERT: Good evening. I'm Mary
3 Lampert, speaking tonight on behalf of the Duxbury
4 Board of Selectmen.

5 The town is very concerned the site will
6 not be properly cleaned up due to reliance on a
7 [Generic Environmental Impact Statement] GEIS written
8 in 2002 and an [Supplemental Environmental Impact
9 Statement] SEIS written in 2006 that are outdated,
10 incomplete, and ignore new and significant
11 information, and the failure of NRC to require a
12 [National Environmental Policy Act] NEPA analysis, as
13 required by federal law and legal precedent, into
14 insufficient funds in the [Decommissioning Trust
15 Fund] DTF.

16 With respect to the GEIS and SEIS,
17 Duxbury sees no rational basis for NRC to assume that
18 the environmental impacts are bounded by these
19 documents, nor that environmental impacts will be
20 small or that the site is essentially clean. It is
21 not. A few examples:

22 The SEIS incorrectly denies that the
23 National Academy's Biological Effects of Radiation
24 Report, 2006, denies to provide new and significant
25 information from the 1990 report. The 2006 report

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 found mortality rates for women exposed to radiation
2 was 37.5 percent higher than its 1990 report and the
3 impact of allowable radiation standards on workers
4 was twice that estimated in 1990. Therefore,
5 allowable doses need to be reduced from the 25
6 millirem a year to less than 10 millirem a year, as
7 the State has requested, and reduction in allowable
8 doses to workers. You are obligated to follow the
9 latest scientific information, not go back to 1990.

10 Second, contamination onsite must be
11 updated. In the GEIS and SEIS, NRC didn't lift a
12 shovel. You just relied on the licensees' reports.
13 Their conclusions cannot be relied upon. Pilgrim
14 opened with bad fuel and no off-gas treatment system,
15 and blew its filters in 1982.

16 Where did the contamination go?
17 Hazardous waste is buried onsite, including on the
18 property off the access road. Construction has
19 occurred at the site and the soil buried. What's in
20 that soil? There's a crack in the reactor's torus
21 floor. Soil outside the reactor, beneath it, must
22 be analyzed. The source of tritium levels of
23 monitoring wells is unknown. Other slower-moving
24 radionuclides also are likely to be there, not yet
25 picked up by the monitoring wells. Also, what is

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 leaked from seismic gaps and the condensate system?
2 Again, who knows? It's not in the 2002 report. It's
3 not in the SEIS written in 2006.

4 NRC's 2014 continued storage rule that
5 the waste may be stored onsite indefinitely has to be
6 considered. The PSDAR's assumptions that spent fuel
7 will be offsite by 2062 cannot be accepted by NRC.
8 Entergy relied on DOE for its projections, but DOE
9 qualified its projections. Entergy and Holtec did
10 not.

11 PSDAR cost estimates and plans to ensure
12 the long-term integrity of the casks must be revised
13 to provide a contingency fund for long-term storage.
14 NRC's Mark Lombard stated that there is no technology
15 to find cracks in Holtec casks. They're made of
16 steel and subject to corrosion. Dr. Kris Singh, the
17 President of Holtec, said that it's not feasible to
18 repair Holtec's sealed canisters.

19 These facts cannot be ignored. Casks
20 must be better protected, monitored for heat, helium,
21 and temperature, and funds for mitigation included in
22 cost estimates because the fuel, as NRC has said,
23 could remain here indefinitely in an environment
24 subject to corrosion, moisture, and salt.

25 The GEIS and SEIS found socioeconomic

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 impacts small. Again, not so. A University of
2 Massachusetts Amherst study commissioned by the Town
3 of Plymouth found that the economic impact on
4 Plymouth alone would be almost \$500 million and that
5 there would be more than \$100 million impact on the
6 rest of the region, including Duxbury.

7 Conclusion: therefore, it's clear that
8 the GEIS and SEIS are totally inadequate and do not
9 bound the environmental impact. The NRC must require
10 both a comprehensive environmental analysis that
11 includes shovels and testing, made public, quite
12 obviously, at the beginning of the decommissioning
13 process and a NEPA analysis.

14 This is a major federal reaction. You
15 cannot pretend it is mere oversight to wiggle your
16 way out of the requirement. You gave the license and
17 you will terminate the licenses. That is a major
18 federal action.

19 And thank you very much.

20 MR. KLUKAN: Thank you.

21 MR. J. LAMPERT: I'm Jim Lampert, and I
22 am also here representing the Duxbury Board of
23 Selectmen. And I'd like to speak briefly on just one
24 aspect.

25 The Selectmen in the Town of Duxbury have

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 serious concerns about the financial aspects of
2 decommissioning. You heard Senator Markey's
3 representative, Senator Warren's representative,
4 Representative Keating's representative, and the
5 Attorney General's Office refer to these.

6 Holtec's PSDAR, like Entergy's, says
7 there is enough money in the Decommissioning Trust
8 Fund to accomplish the job. Putting aside all of the
9 things the PSDAR doesn't talk about, and Mrs. Lampert
10 just listed, that assumption by Entergy and Holtec
11 rests on a further assumption that future costs in
12 decommissioning will not be more than future
13 increases in general inflation. That assumption is
14 highly questionable.

15 According to Callan Associates that
16 annually puts together a report on decommissioning
17 costs for the nuclear industry, decommissioning costs
18 increased at an annual rate of about 5.8 percent
19 between 2008 and 2016. This increase in cost is
20 about 4.5 percent above inflation. For a benchmark,
21 the NRC and the PSDARs assume that the Trust Fund
22 will grow at a rate of only 2 percent of the general
23 inflation.

24 The NRC's own questions and answers on
25 decommissioning financial assurance say that, over a

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 20-year period, there will be an annual increase in
2 decommissioning costs of between 5 and 9 percent.
3 Again, well over both inflation and 2 percent above
4 inflation. If the NRC's statements are correct, and
5 if Callan's reports of actual past history are
6 correct, it seems highly unlikely that there's going
7 to be enough money in the fund to accomplish the job.

8 Which leads me to a fundamental question
9 of the Board of Selectmen: if there is not enough
10 money, what law or regulation requires a licensee,
11 particularly a limited liability corporation like
12 Holtec-Pilgrim, or any of its parent or associated
13 entities, to pay the shortfall? Can you tell me if
14 there is such a regulation? And if so, tell me what
15 it is. And if you cannot do now, can I ask that you
16 tell us all tomorrow night at the decommissioning
17 panel meeting to give you the time to get the answer?

18 MR. KLUKAN: Thank you.

19 MS. CHIN: Rebecca Chin for the Town of
20 Duxbury. The Selectmen asked me to speak on public
21 safety this evening.

22 And we urge you to retain the current
23 offsite emergency planning funded by the licensee
24 until the spent fuel pool is emptied and continue
25 licensee-funded offsite emergency planning on a

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 reduced level until all the fuel leaves the site.

2 Entergy has currently filed for a license
3 exemption to end offsite and reduce onsite funding,
4 and this should be denied by the NRC. You cannot
5 expect mutual aid with no funding.

6 The second is on monitoring. Mass
7 Department of Public Health should continue to expand
8 offsite radiological monitoring and onsite tritium
9 monitoring. The licensee should continue to provide
10 Mass Department of Public Health with its funding.
11 It needs to be required of the licensee.

12 Thank you.

13 MR. KLUKAN: Thank you.

14 MS. LYNCH-BENTTININ: Sheila Lynch-
15 Banttinnin in Duxbury, speaking on behalf of the Board
16 of Selectmen.

17 I would like to address one issue. Forty
18 years ago when community safety was being addressed,
19 telephone poles and speakers were the technology of
20 the time. Currently, in our Town of Duxbury, which
21 is within the 5-mile zone of Pilgrim, we have an Old
22 Colony network, digital network, of public safety
23 addresses. I would like Holtec, if they are going
24 to start next July, to engage the regional fire
25 departments and the Old Colony system of current

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 digital notification to be engaged in community
2 safety and planning during the three very important
3 years, especially after what just happened in
4 California with the accident. If there's an accident
5 during the Holtec time, if they're given the license,
6 and you're not up-to-date with the current fire
7 department technologies in the region, it will be a
8 very tragic day. So, I encourage Holtec, if they're
9 given the license in July, to reach out to the
10 regional fire departments and the emergency
11 notification system, which has been greatly upgraded
12 since 40 years ago.

13 Thank you.

14 MR. KLUKAN: Thank you very much.

15 Are there any other elected officials or
16 representatives of elected officials or
17 representatives of federally-recognized tribes who
18 would like to introduce themselves this evening
19 before we move on to the public comment portion?

20 (No response.)

21 All right. Hearing none, I would like
22 to introduce Donna Janda, and we will proceed with
23 the public comment portion.

24 MS. JANDA: Thanks, Brett.

25 Good evening, everyone. As Brett said,

1 my name is Donna Janda, and I'll be facilitating
2 tonight's meeting along with Brett.

3 For those of you who registered to speak,
4 you should have received a ticket, the other half of
5 which Brett has in a container over here. And the
6 speaking order is going to be determined by the
7 numbers that are pulled from the container. And the
8 intent of this is so that the speaker order is just
9 random.

10 So, I do want to emphasize there is no
11 prohibition against donating your ticket to others.
12 You are free to do so. However, both individuals
13 should be present at the time that number is called,
14 and the donation must be announced at that time.

15 In addition, if an individual has already
16 spoken during the meeting as a result of someone
17 donating their ticket, and then, that individual's
18 ticket is called, that individual may not use that
19 ticket, but they can donate it to someone else. This
20 is just to give opportunity to everyone to be able to
21 speak.

22 So, when your number is called, please
23 queue up to the microphone that's in the aisle, in
24 the center aisle right there. And if you need to
25 have a microphone brought to you, just let us know,

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 and Brett will take care of that for you.

2 Just so you have some advanced warning of
3 when it's your turn to speak, Brett's posting the
4 numbers right now as I'm speaking, and we're going to
5 just go down them in sequential order there.

6 In an effort to give everybody the
7 opportunity to speak tonight, please limit yourselves
8 to three minutes when we speaking. We do have a
9 clock here on this table in the center here, in front
10 of the podium, and we'll count down those three
11 minutes. And after the three-minute mark, I'll
12 politely ask you to conclude your remarks.

13 For your awareness, the meeting tonight
14 is being recorded, and there is a transcript that
15 will generated after the meeting. Both the audio and
16 the transcript will be posted to the NRC website.
17 So, in light of that, I would ask, when it's your
18 turn to speak, that you please identify yourself.
19 And I would also ask, for the sake of the audio
20 recording, that people not speak over each other.

21 I would also ask that we keep this area
22 clear in front of the stage. If there is something
23 you would like to give to the NRC staff, you can give
24 that to Brett and he'll take care of that.

25 And now, just some basic groundrules to

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 go over. While recognizing many of you have
2 strongly-held opinions concerning the matters that
3 were discussed tonight, I ask that you, nonetheless,
4 adhere to civil decorum, that you respect each other.
5 So, please do not disrupt each other. Just as you
6 wouldn't want to be interrupted during your three
7 minutes at the microphone, please respect the
8 speaking time of others.

9 Any threatening gestures or statements
10 will under no circumstances be tolerated and will be
11 cause for immediate ejection from the meeting. If
12 you feel you've been threatened, please let me know
13 or please tell one of the NRC security personnel or
14 police officers in the room, and we will try and
15 address that.

16 The one thing that I do want to also
17 note -- and I haven't heard any tonight -- but please
18 make sure you silence your cell phones, so that
19 doesn't disrupt the meeting.

20 And I think we are ready to go at that.
21 So, the first number on the list is No. 2.

22 PARTICIPANT: I've already spoken.

23 MS. JANDA: Okay. Would you like to
24 donate that ticket to somebody else to speak?

25 MR. KLUKAN: Would anyone who didn't sign

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 up yet to speak like to speak right now?

2 (No response.)

3 All right. So, let's break this down.

4 This system is designed -- I actually just
5 experienced this at a Westinghouse meeting in South
6 Carolina where we didn't have that many numbers. So,
7 this is everyone. This is everyone who signed up to
8 speak. So, we have 14 people who signed up to speak.
9 There will likely be some opportunity at the end,
10 after these individuals have spoken, if you haven't
11 signed up to speak, or if you decide after hearing
12 comments to speak then.

13 So, the plan is just to move through
14 these numbers, and then, again, open it up after that.
15 I'm still going to keep people to the three minutes.
16 And then, if people have additional things to say
17 after that, once we've gotten through the list, and
18 whether there's any additional people who would like
19 to speak, then we can add on a second round, as time
20 permits. Okay?

21 So, did anyone want to use the No. 2
22 ticket?

23 (No response.)

24 If not, we will move on to the No. 12
25 ticket.

1 Pass? All right. Look at the time we
2 are making this evening.

3 (Laughter.)

4 The No. 1 ticket. Do you want to go?

5 MS. LAMPERT: Yes.

6 MR. KLUKAN: All right, go. All right.

7 MS. LAMPERT: Mary Lampert for Pilgrim
8 Watch.

9 I just want to amplify the concern of our
10 town and other speakers of maintaining licensee
11 responsibility for offsite emergency planning in full
12 force, as it is now, whatever it is, until the pool
13 is emptied, and then, ratcheted-down until fuel
14 leaves the site.

15 What is not properly considered by NRC or
16 the licensees is our acts of malice. We know there
17 is a heightened threat environment, and we know that
18 the spent fuel pool is a vulnerable target, as
19 demonstrated by an expert for our Attorney General,
20 Dr. Gordon Thompson, during relicensing.

21 We know, also, that even in a cask they
22 are vulnerable to acts of malice by a shoulder-launch
23 missile, for example, and then, in the hole, putting
24 in an explosive. This is described in excruciating
25 detail, again by Dr. Thompson, both in hearings in

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 the United States, recent ones, and in Canada.

2 So, you have to consider it. The fact
3 that the probability may be low, you can take an
4 arithmetic view to it because of the consequences
5 being so great as they are.

6 And consider also, we are very glad the
7 ISFSI pad has been moved to higher ground. However,
8 unfortunately, it wasn't moved to the Manomet side.
9 It was moved more towards, I'd say, the Duxbury side.
10 And it is very, very close to Rocky Hill Road.

11 So, we have gained a great deal by not
12 having it subject to climate change effects, but we
13 have lost on security. Therefore, we need a
14 reinforced barrier or some measure, a building or
15 something, to provide the security we need, because
16 the threat is not going away and each cask contains
17 over half the cesium-137 released in Chernobyl.

18 Thank you.

19 MR. KLUKAN: Thank you very much.

20 MS. JANDA: And the next number is No.
21 3.

22 PARTICIPANT: Pass.

23 PARTICIPANT: I'll take it.

24 MR. KLUKAN: It's important to hold the
25 physical copy of the ticket. I'm just kidding.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Could you state your name for the record?

2 MR. WOLFE: My name is Dan Wolfe. I'm
3 from Harwich on Cape Cod, and I also serve on the
4 Nuclear Decommissioning Citizens Advisory Panel.
5 So, I'll see you all tomorrow night, and I appreciate
6 your being here.

7 In case there are people that can't be
8 there tomorrow night that are here tonight, we have
9 heard expressed by numerous folks from our
10 legislative delegation, the Attorney General's
11 Office, a real concern that there isn't sufficient
12 funds. And we could go back and forth on that. It's
13 conjecture. It's based on certain assumptions
14 relative to economic returns on what's in the Trust
15 Fund.

16 So, I guess I have a really specific
17 question. And that is, what happens if there isn't?
18 What happens if there is not specific funds? Where
19 does the burden go?

20 MR. KLUKAN: Thank you.

21 MR. WATSON: The short answer is the
22 licensee remains responsible for completing the
23 decommissioning and providing the funds that are
24 necessary to do that. So, that would be a
25 responsibility that, if we were to grant the license

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 transfer to Holtec, they would be responsible for and
2 for complying with the requirements.

3 MR. WOLFE: Could I ask a followup
4 question to that, please?

5 MR. KLUKAN: Sure. You have like two
6 minutes left.

7 MR. WOLFE: Okay. Thanks.

8 So, I guess question would be, is there
9 any precedent or is there an ability to hold the
10 original licensee liable in addition to Holtec?
11 There are layers of sort of corporate creation here
12 that I think limit and insulate from liability. So,
13 I question would be, is there a mechanism, is there
14 a precedent, is there a way to keep Entergy
15 potentially liable or the investors in Entergy
16 potentially liable if the funds are insufficient?

17 Because our concern is it goes to that
18 entity, and, of course, the well is dry. And by the
19 way, that is by design. That is by corporate design
20 as far as how this is being constructed.

21 Thank you very much.

22 MR. KLUKAN: Thank you again.

23 MR. WATSON: To the best of knowledge,
24 we don't have any precedent. We have had some sites
25 go bankrupt, and we've worked with the trustee of the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701

1 Trust Fund to complete the decommissioning. So,
2 there's no -- once we complete our review, and if we
3 were to transfer the license, there would be no going
4 back to Entergy for the funds. So, it's either
5 they're going to be qualified to do that and accept
6 that responsibility or not.

7 MS. JANDA: The next speaker will be No.
8 4.

9 MS. TURCO: Diane Turco with Cape
10 Downwinders.

11 Being a good neighbor means taking care
12 of each other and making decisions for the common
13 good. Entergy has advertised itself as a corporation
14 that is a good neighbor -- as long as there is money
15 to be made. Now the plug will be pulled in June and
16 the coffers will dry up. Entergy is running for the
17 exit door and leaving their legacy mess behind.

18 Entergy's PDS[A]R calls for SAFSTOR,
19 making Pilgrim a radioactive holding tank for 60
20 years. Holtec for DECON, prompt decommissioning
21 using the Decommissioning Trust Fund with exemptions.
22 What is best for the community should be the priority
23 of both their plans, but it is not.

24 We all agree that prompt decommissioning
25 is the best, but it must be done responsibly and

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 safely. The following are our standards to meet the
2 good neighbor requirements:

3 With the ISFSI holding tons of
4 radioactive waste, there's still a potential for
5 offsite release. The PSD[A]R must include emergency
6 plans based on low-probability, high-consequence
7 incidents, such as terrorists attacks, and be
8 included in the Environmental Impact Statement.

9 Location of the ISFSI pad must consider
10 a technically-defensible onsite storage location.
11 That's not what we have now.

12 Dry cask must be improved with quality
13 and be able to be inspected, monitored, repaired, and
14 are retrievable.

15 Procedures must be in place for transfer
16 of waste from any cracked or damaged canisters or
17 casks which may mean keeping the pool.

18 Procedures and training for fuel transfer
19 with certification of completion by the NRC prior to
20 moving any fuel from the pool.

21 Residual radiation levels must match
22 [Environmental Protection Agency] EPA standards and
23 inclusion of independent oversight.

24 Finally, we ask for an [Attorney General
25 Office] AGO inspection into Holtec and its

1 subsidiaries before any license transfer. As
2 [Limited Liability Corporations] LLCs, this looks
3 like a house of cards with no guarantee that available
4 funds will be available to complete the job.

5 The citizens of Massachusetts must have
6 clear assurance that the taxpayers will not be left
7 paying off the mess Entergy has left behind.

8 Looking at Holtec's record from recent
9 events at San Onofre near San Diego, confidence in
10 their ability to make decisions based on protection
11 of the public is questionable. An NRC special
12 inspection report of a near drop of a full canister
13 cited poor training, not following procedures,
14 equipment problems, and mismanagement. Sound
15 familiar? Poor management, poor training, poor
16 procedures, et cetera, has kept Entergy's operation
17 at Pilgrim as the least safe in the U.S. still. This
18 is like going from the frying pan into the fire. We
19 don't need another corporation here with a poor
20 safety culture that puts profit over public safety.

21 We are concerned neighbors and will
22 support a responsible and safe decommissioning plan
23 that protects our communities. If Holtec is setting
24 the standard at SONGS, Cape Downwinders cannot
25 support the transfer of license from Entergy at this

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 time.

2 You need to go back to the drawing board
3 and do better for our communities.

4 MR. KLUKAN: Thank you very much.

5 MS. JANDA: The next speaker will be No.
6 9.

7 MR. ROTHSTEIN: Good evening. Richard
8 Rothstein, Town of Plymouth resident and a new member
9 of the State Nuclear Decommissioning Citizens
10 Advisory Panel.

11 I asked the question during last week's
12 webinar regarding Entergy's PSDAR for SAFSTOR about
13 the anticipated timeline for when the NRC would allow
14 the onsite meteorological towers to get dismantled
15 during the decommissioning process under SAFSTOR.
16 The NRC couldn't answer that question, only because
17 it's a little bit too early in the process. So, I
18 just wanted to rephrase my question.

19 Why is it important to have the onsite
20 meteorological towers? They're important because of
21 emergency planning purposes. In the event of a
22 radiological emergency with the plant still operating
23 or once the plant is permanently shut down, but spent
24 fuel in the pool, before it gets transferred, and
25 even with the dry casks onsite, if there were a

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 radiological emergency, a release, emergency
2 responders would need to have that information to be
3 able to make determinations of shelter in place
4 versus emergency evacuation determinations there.
5 This need doesn't disappear simply just because the
6 plant is permanently shutting down.

7 So, to rephrase my question from last
8 week, I'd be interested in learning about other
9 plants that have decommissioned or are in the process
10 of decommissioning, most using SAFSTOR, but some are
11 probably going to use DECON, and when the NRC allowed
12 a licensee to dismantle the onsite meteorological
13 towers. I don't expect you would have an answer
14 tonight, but certainly in the next few weeks I'd be
15 very interested in learning more about that history,
16 so we can see what circumstances did NRC require those
17 towers to stay up longer or other circumstances where
18 they allowed a licensee to dismantle them sooner than
19 later.

20 Thank you.

21 MS. JANDA: All right. Thank you.

22 The next speaker will be No. 10.

23 MR. WALLEN: Hello. My name is Stan
24 Wallen, a resident of the Town of Plymouth. And I'll
25 disclose that I'm a retiree of Pilgrim Nuclear Power

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Station.

2 I have one simple question for Holtec.
3 Based on the numbers you put up on the board, where
4 are you going to make \$89 million in five years? You
5 need 1.54 billion to decommission in your timeline.
6 You have 105 now. If you're in the business to make
7 money, where are you going to get an additional almost
8 90 million?

9 MR. KLUKAN: One moment.

10 MS. STERDIS: This is Andrea Sterdis.

11 And the cash flow analysis that are
12 included in both the license transfer application as
13 well as the PSDAR for DECON demonstrate that the costs
14 will be distributed over time, and it does accurately
15 reflect the regulations regarding the Trust Fund
16 increases over time.

17 MR. WALLEN: I see. So, I'll just quote
18 a former presidential candidate, that we're working
19 with, "voodoo economics".

20 Secondly, this whole situation here
21 almost looks like it's down pat that Holtec will get
22 a license transfer. What is the consequence of the
23 NRC not approving a license transfer? We're going
24 to have Entergy try to decommission and take 60 years.
25 Is there a method or order or compulsion that can

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 happen to have Entergy accelerate the process? Are
2 we stuck with that if the license transfer is not
3 approved? An NRC question.

4 MR. WATSON: Okay. Yes, first of all,
5 we are in the process of reviewing the Holtec
6 application and the associated financial and
7 technical information that has been provided. So,
8 there's been no conclusion on that.

9 Should we deny the application and not
10 allow the transfer to take place, yes, Entergy would
11 remain the licensee and be responsible for
12 maintaining the plant in a safe condition. So, we
13 would continue to inspect as we will if the license
14 were transferred the facility to ensure it's
15 maintained safely, and regardless of the DECON option
16 or SAFSTOR option they choose. But the bottom line
17 here is the licensee would be, continue to be Entergy,
18 and their requirement is that they have to complete
19 the decommissioning in 60 years.

20 MR. WALLEN: Thank you.

21 MR. KLUKAN: Thank you very much.

22 Would it be beneficial to people if we
23 put back up the slide with one of the numbers instead
24 of just looking at "Thank you," which I'm sure is
25 very useful to all of you? Maybe either the Pilgrim

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 numbers, or the Entergy numbers or the Holtec number,
2 one of the two? Okay. Thanks for doing that.

3 MS. JANDA: Okay. The next speaker will
4 be No. 14.

5 MS. CONSETINO: Good evening, everybody.
6 I'm Henrietta Consetino, resident of Plymouth and,
7 also, Chair of the League of Women Voters Nuclear
8 Committee.

9 And I thank you for coming tonight. We
10 appreciate it. It's very important.

11 I also want to say I appreciate greatly
12 the speakers who came from the offices of our elected
13 officials. It was very helpful to have their
14 comments.

15 I have a question, but I'll save it for
16 last. My first is just a comment in total laymen
17 terms. We have two possibilities right now. On the
18 one hand, we have Holtec proposing to decommission in
19 a very short amount of time, and for cheap, and
20 phenomenally. It just sounds too good to be true,
21 particularly if you start to pay attention to the
22 nature of the dry casks that are being proposed and
23 the fact that these very same dry casks have been
24 tremendously troublesome at San Onofre and probably
25 in other places, too, all of them scratched, being

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 subject to erosion from saltwater, being stored on
2 the beach.

3 At least in San Onofre, the plan was it's
4 now suspended for a time, but the plan was to put
5 these faulty casks in a vaulted system. Here in
6 Plymouth, there is no proposal for any kind of
7 vaulting, any kind of hard cover for these very
8 vulnerable casks that could be subject to terrorism.

9 We appreciate the moving of the ISFSI,
10 and that was important to us, but there is much more
11 that needs to be done if Holtec is to have the
12 license. It's also very disturbing that Holtec is
13 requesting waivers for a certain amount of
14 regulations, just as Entergy has been granted waivers
15 for the computer security that was required for all
16 of their plants in the wake of Fukushima, waiver from
17 the kind of hard valves that would make it safer.
18 So, this is disturbing.

19 On the other hand, if we go with so-
20 called, grotesquely-called SAFSTOR, 60 years of
21 decommissioning, this is surreal. We will all be
22 gone 60 years from now, every single one of us in
23 this room, unless there is a very young person. And
24 many of our children will be gone, too. And I wonder
25 who exactly is going to be in charge, what they will

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 have been told, and so forth.

2 Have I reached my limit? Okay. I stop
3 there then.

4 MR. KLUKAN: Thank you very much.

5 MS. JANDA: The next speaker will be No.
6 8.

7 MR. GARLEY: Hi. I'm John Garley. I'm
8 from Hingham.
9 I have an NRC Information Notice 2012-20 [Potential
10 Chloride-Induced Stress Corrosion Cracking of
11 Austenitic Stainless Steel and Maintenance of Dry
12 Cask Storage System Canisters, dated November 14,
13 2012 (ML12319A440)] that says that chloride-induced
14 stress corrosion cracking of austenitic -- right?
15 You got the right word? -- stainless steel in dry
16 cask storage systems. And there's a couple of
17 times that it happened in San Onofre, St. Lucie
18 Nuclear Power Plant, Turkey Point, and through the
19 wall at Koeberg Nuclear Power Station. Are these
20 casks made out of this austenitic steel? That's a
21 question for Holtec. Austenitic. Are you going to
22 answer the question or?

23 PARTICIPANT: Austenitic.

24 MR. GARLEY: Austenitic? Thank you.
25 Are these casks made out of that? Because this

1 document says that they're cracked from being near
2 saltwater.

3 Do you need to hit a button or something
4 (referring to microphone)?

5 MR. KLUKAN: I'm just going to phrase it.
6 Would someone from either Entergy or Holtec like to
7 answer that question?

8 MR. GARLEY: Well, my concern is that the
9 [Chief Executive Officer] CEO says that, if there is
10 a crack, you couldn't fix it, right? And you might
11 not be able to find it. But if there's no fuel pool,
12 what do you do with that cask? So, that's a question
13 for Holtec. Do we have a solution if there's a cask
14 leak, and what are you going to do with it?

15 MS. J. RUSSELL: My name is Joy Russell.
16 I think that Andrea did introduce me at the very
17 beginning.

18 First, I would like to say that your
19 information about canisters is incorrect. There are
20 no leaking canisters in the United States. Holtec's
21 canisters do not leak. There has been no --

22 MR. GARLEY: The steel has corroded.

23 MS. J. RUSSELL: That is incorrect, sir.
24 I have --

25 MR. GARLEY: Okay. Well, that's an NRC

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 information docket number. So, you might want to
2 check with them. I'm just going by what they have.

3 MS. J. RUSSELL: Okay. Holtec's
4 canisters have no evidence of stress corrosion
5 cracking.

6 MR. GARLEY: Really? All right. Well,
7 you might want to talk to them because they're putting
8 stuff online that says they do. All right?

9 And then, the Sierra Club put a letter to
10 the NRC as well -- it's Event No. 51134 [event date
11 June 6, 2015 - [https://www.nrc.gov/reading-rm/doc-](https://www.nrc.gov/reading-rm/doc-collections/event-status/event/2015/20150610en.html)
12 [collections/event-](https://www.nrc.gov/reading-rm/doc-collections/event-status/event/2015/20150610en.html)
13 [status/event/2015/20150610en.html](https://www.nrc.gov/reading-rm/doc-collections/event-status/event/2015/20150610en.html)] -- that Holtec
14 filled the Diablo Canyon canisters incorrectly in
15 half of them. Is that incorrect as well? Because
16 there's stuff online you might want to cancel.

17 MS. J. RUSSELL: Sir, I beg to differ
18 with you; that is also incorrect.

19 MR. GARLEY: Again? Okay.

20 MS. J. RUSSELL: The Diablo Canyon
21 canisters, which were loaded by Holtec on behalf of
22 Pacific Gas and Electric, were all loaded correctly
23 in accordance with our Certificate of Compliance.

24 MR. GARLEY: Okay. Well, somebody's got
25 some bad -- and the last thing is with NRC. Are you

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 considering deep isolation technology as well,
2 besides just Holtec's stuff? Because, I mean, we're
3 getting one option here or two that sound pretty bad
4 to me.

5 MR. WATSON: Well, let me just state that
6 there is --

7 MR. GARLEY: It just stopped my number
8 (referring to the tickets for order of speakers).

9 MR. WATSON: There is a need in the
10 country for permanent repository of the spent fuel.

11 MR. GARLEY: Uh-hum.

12 MR. WATSON: The Department of Energy is
13 responsible for developing and finding that site and
14 using the proper technology. So, it's really up to
15 our policymakers in Washington to fund those
16 activities and to allow them to do their work in
17 identifying and developing a site and what
18 technologies will be used with that.

19 I think everybody is aware that there was
20 some work-in-progress at the Yucca Mountain site in
21 Nevada. And so, that came to a halt. And so now,
22 it's up to the policymakers to reinstate the need or
23 the promise they made for disposing of this material.

24 MR. GARLEY: Okay. And my last question
25 for Holtec is that you have sent an application to

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 the NRC for interim storage in Lea County, New Mexico.
2 Does that mean you want to move this waste to New
3 Mexico? Is that on your plan?

4 MS. J. RUSSELL: Sir, you're correct,
5 Holtec has submitted a license application to the
6 Nuclear Regulatory Commission to license a
7 consolidated interim storage facility in southeast
8 New Mexico. And if the facility is constructed, it
9 is the possibility of moving the fuel from here to
10 that facility in New Mexico. That is correct.

11 MR. GARLEY: All right. So, the DOE says
12 there's 5,000 train car incidents a year. Do you
13 think that could be dangerous with stuff that's
14 corroded from the ocean?

15 MS. J. RUSSELL: Sir, if I understand
16 your question correctly, you're asking for my
17 opinion --

18 MR. GARLEY: Yes.

19 MS. J. RUSSELL: -- if I think
20 transportation of spent nuclear fuel is safe. Yes,
21 I do. The industry does it on a regular basis. We
22 have transported more than 1380 shipments by rail,
23 all safely, without any release of radioactive
24 material.

25 MR. GARLEY: Okay. Thank you.

1 MS. JANDA: Thank you.

2 MR. KLUKAN: Thank you very much.

3 Before we move, since we do have some
4 time, we kind of left that hanging there, that
5 question. So, just to clarify, so the members of the
6 public don't go away potentially confused on this.

7 Are the casks made out of this kind of
8 steel, or if they're not, could we just state that
9 for the record? Because we kind of moved on to the
10 second question without answering the first. I just
11 want to make sure, because it seemed like there was
12 some confusion about that amongst the crowd.

13 MS. J. RUSSELL: Yes, the canisters are
14 made out of austenitic stainless steel.

15 MR. KLUKAN: All right. Thank you. I
16 appreciate that.

17 MS. JANDA: The next speaker will be No.
18 11.

19 MS. MILLER: Hello. My name is Claire
20 Miller. I'm the lead organizer with Toxics Action
21 Center. We're a public health and environmental
22 nonprofit founded in 1987.

23 And while I don't consider myself to be
24 an extremely young person, it is conceivable that I
25 could live to 93.

1 And I'm a community organizer, but I also
2 happened to grow up -- I was born and raised in
3 Duxbury, Massachusetts. And so, I want to speak a
4 little bit more from the heart tonight.

5 At Toxics Action Center we've really seen
6 over our history that corporations go to very great
7 lengths to avoid cleaning up their messes. And as a
8 teenager, I have a lot of memories hearing about
9 Pilgrim Nuclear Power Plant. It's not every
10 childhood that you learn your home could be in a
11 nuclear meltdown.

12 My father is a curious man. He took
13 tours of the nuclear power plant before they stopped
14 doing that after 9/11. He told me stories about how
15 the folks would say, "Oh, don't stand there. That
16 spot's hot."

17 We also had a family friend who worked at
18 like a landscaping company. And I remember my father
19 and them joking about, you know, how the site
20 was -- there are hidden mysteries. And my distinct
21 impression was that they weren't kidding, even though
22 they were talking in a funny manner.

23 So, it really disturbs me that this isn't
24 proceeding with extreme care to the data. And I want
25 to say that it's extremely important to me that

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 there's a comprehensive environmental analysis done
2 on the entire site. We have to know really what's
3 there.

4 The second piece here is that, as corny
5 as it may sound, we're in Hotel 1620. I am actually
6 descended from a pilgrim, and that's 15 generations
7 of my family. And I have an intention to do well by
8 this place. You know, my descendants haven't always
9 done well by this land, and I'd like to see 15 more
10 generations. But that's only possible if we do an
11 extremely good job. So, it's very important to me
12 that we honor the Commonwealth's desire for a cleanup
13 standard of no less than 10.

14 And the third thing that I am really
15 sitting on as we're here is really around drinking
16 water. It's so precious. And once it's
17 contaminated, it's extremely difficult to fix.

18 Toxics Action Center is working with
19 countless communities across the region who don't
20 have access to clean drinking water. And so, as this
21 continues, as the NRC oversees the future of the site,
22 we have to ensure that there's clean drinking water
23 and we must meet the EPA's own standard of no less
24 than 4 for the drinking water.

25 Thank you.

1 MR. KLUKAN: Thank you very much.

2 MS. JANDA: The next speaker will be No.
3 7.

4 MS. CORRIGAN: Hi. Joanne Corrigan. I
5 live in Plymouth. I can ride my bike to the power
6 plant.

7 I've got a couple of questions. First
8 of all, that beautiful slide they showed of Yankee
9 Rowe, how pastoral it looked after the
10 decommissioning, where are the spent fuel casks? Is
11 that airbrushed or Photoshopped?

12 (Laughter.)

13 MR. WATSON: No, that's an actual
14 picture. The dry fuel storage facility is located
15 above the river there on the hill.

16 MS. CORRIGAN: Because Plymouth will
17 never look like that. First of all, we have that
18 nasty jetty that's ripped the sand off Priscilla
19 Beach. And apparently, that's staying there, even
20 though the slides are saying how it goes back to the
21 natural state in the environment. Is that right?
22 Isn't Holtec going to leave the jetty there? After
23 the reactor cools, I know --

24 MR. WATSON: I guess Holtec can maybe
25 answer.

1 MS. STERDIS: It is our plan to leave the
2 jetty there.

3 MS. CORRIGAN: Okay. My other
4 question -- and I agree 100 percent with Mary Lampert
5 that you're moving the casks now. Finally you
6 figured out it's too close to the ocean. You didn't
7 need a study. Just come down to Priscilla Beach
8 during a full moon when there's a nor'easter, and
9 you'll see the waves come crashing onto the street.
10 Why they put those first ones so close is beyond me.

11 Now where they're going to move them,
12 they're right out in the open of Rocky Hill Road.
13 And what's to prevent, say, a dump truck with about
14 10 terrorists with RPGs or AR-15s with armor-piercing
15 bullets from stopping there, jumping up, and not
16 shooting at 100 casks, shooting at one cask? What's
17 the chance of that being compromised and breached and
18 releasing radiation?

19 MS. J. RUSSELL: Again, Joy Russell.

20 In November, we presented at the Citizens
21 Advisory Panel
22 [<https://www.youtube.com/watch?v=5OWW70ZbXlQ>] a very
23 lengthy discussion -- I personally did that with one
24 of my colleagues -- about the safety and security
25 that's offered by the Holtec HI-STORM 100 System

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 that's in use at Pilgrim. In that discussion, which
2 you can go back and I believe see it online, I
3 presented a long discussion about the casks' ability
4 to withstand even an aircraft crash
5 [[https://www.mass.gov/files/documents/2018/12/10/Ho
7 ltec%20Cask%20Design%20NDCAP%20Nov%2028th.pdf](https://www.mass.gov/files/documents/2018/12/10/Ho
6 ltec%20Cask%20Design%20NDCAP%20Nov%2028th.pdf)].
8 So, the system is very robust and it can withstand
9 what you have just described as beyond-design-basis
10 scenarios.

11 MS. CORRIGAN: I see. Well, my third
12 comment is, when Pilgrim was up and running and
13 actually made money, Entergy still couldn't get them
14 out of the column 4 degraded column, didn't want to
15 spend the money, didn't have the expertise, didn't
16 have the enthusiasm, all of the above.

17 What makes you think we are going to
18 believe, after the NRC gives them a pass on the
19 cybersecurity, the everything, that now, all of a
20 sudden, they're offline, they're not making money,
21 and they're going to put in the resource of the money
22 to keep us safe? I don't believe that for a minute.

23 Thank you.

24 MR. KLUKAN: Thank you.

25 MS. JANDA: The next speaker will be No.
5.

1 MS. CONSETINO: Now I'll finish my
2 comment, but I'll make it very quick.

3 I wanted to follow up on the
4 comments -- I'm sorry. Henrietta Consetino.

5 MS. JANDA: Thank you.

6 MS. CONSETINO: Plymouth resident,
7 League of Women Voters.

8 I wanted to follow up on the many
9 questions about finances, and go back to Jim
10 Lampert's question. Where is the regulation that
11 actually holds the licensee responsible, should the
12 fund, the Decommissioning Trust Fund, be inadequate?
13 And along the way, what happens if the stock market
14 crashes, and 1.05 billion turns into 900 million, or
15 something of that sort? What happens then? What is
16 the state of the Trust Fund right now?

17 MR. KLUKAN: Thank you.

18 MR. TWOMEY: Mike Twomey, on behalf of
19 Entergy.

20 We provide a periodic update on the value
21 of the Trust Fund, and we do not have an up-to-date
22 number available this evening.

23 MR. KLUKAN: Just to follow up, so we
24 don't leave it like that, when do you provide these?
25 So, October was the last one. When would you provide

1 the next one?

2 MR. TWOMEY: Well, we at least provide a
3 number in March of every year as part of our annual
4 disclosure to the NRC. I don't know if we will be
5 providing one before March. And it's actually a
6 March number. I think it actually comes out in
7 April.

8 MR. KLUKAN: Okay. Thank you.

9 MS. CONSETINO: It's worrisome because
10 we've had some very serious major plummets in the
11 market since October.

12 But I want to go back to the first
13 question and make sure you don't forget that Jim
14 originally asked, is there a regulation that holds
15 the licensee to its financial responsibilities? And
16 if so, what is that regulation?

17 MR. KLUKAN: Again, thank you.

18 MR. WATSON: Let me respond. I'm sorry.
19 The regulations for the decommissioning funding are
20 spelled out in 50.82. The actual requirement, if
21 you're going to accept or apply for a license with
22 the NRC, means that the licensee will be responsible
23 for providing the decommissioning funds to restore
24 the site and have the license terminated. Those are
25 in, I think it's 50.2. When a licensee applies for

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 a license, there's something called the Common
2 Defense Clause, which means you are accepting that
3 responsibility when you apply for a license, and that
4 you will be radiologically and environmentally
5 responsible for cleaning up the site when you've
6 completed the work.

7 PARTICIPANT: What if they go bankrupt?

8 MR. WATSON: They're still responsible
9 for providing the funding, and that would be part of
10 the process we would go through for getting the assets
11 of the company and continuing the completion of the
12 decommissioning.

13 MR. WATSON [KLUKAN]: We have two more,
14 and then, we can potentially do a second round. But
15 the question that was posed on the floor, to which
16 Bruce responded, was, what happens if they go
17 bankrupt? I just wanted to make sure we capture that
18 for the transcript.

19 So, next up will be No. 13.

20 MR. GUSTAFSON: Good evening. My name's
21 Scott Gustafson. I'm a Plymouth resident.

22 I'm happy to hear tonight that Holtec is
23 planning on going with the DECON process and the
24 expedited process. I'm here to support the license
25 transfer to Holtec because of their technical

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 expertise.

2 As a representative of the Laborers'
3 International Union of North America, our union has
4 worked extensively with Holtec and their subsidiaries
5 around the country, successfully, safely,
6 efficiently.

7 I don't know if some of the references to
8 Holtec tonight are accurate, because we've always
9 worked closely with them. It's always been safe.
10 It's always been very efficient.

11 I have a brother and sister who are
12 working down at Pilgrim now, or have worked on the
13 last two projects with Holtec down there. I don't
14 hear anything about unsafe conditions. I hear that
15 the job is going great; they're moving the fuel
16 correctly, and they're very comfortable, and they're
17 making a great living while they're doing it. The
18 plant has always been an economic benefit to our town,
19 and decommissioning this way will also be a strong
20 economic benefit.

21 I also want to say that Holtec works
22 extensively with our International Union and has
23 helped us develop a state-of-the-art rad worker
24 training program, and we train workers in our state-
25 of-the-art facilities here in New England, in

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Hopkinton, in Pomfret, Connecticut. And over the
2 years, our members have decommissioned Maine Yankee,
3 Connecticut Yankee, and the Yankee Rowe Plant, which
4 I actually go rafting up there, tubing up there in
5 that river. It's a beautiful site. I go up there
6 every year. It doesn't bother me at all.

7 I'm happy that it's going to be the
8 expedited decommissioning and return that site back
9 to its beauty that it once was for the Town of
10 Plymouth.

11 So, thank you very much.

12 MR. KLUKAN: Thank you.

13 MS. JANDA: And the last speaker on the
14 list will be No. 6.

15 MS. CARPENTER: My name is Susan
16 Carpenter with the Cape Downwinders, and I live in
17 South Dennis on the Cape.

18 I have a comment, and then, I have two
19 questions. At one of the Nuclear Decommissioning
20 Citizens Advisory Panel meetings, Holtec spoke and
21 said that they have an impeccable safety record. On
22 the other hand, the fact that that near-drop on the
23 West Coast occurred kind of defies their claim that
24 they have an impeccable record. And not only that,
25 but it was a whistleblower that brought this to public

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 attention.

2 My questions are: is it a conflict of
3 interest for Holtec to buy Holtec casks to store the
4 nuclear waste?

5 MR. WATSON: I guess that's a commercial
6 thing that the NRC would not get into, but I don't
7 see any real issue with it. It is what their product
8 line is and what they're offering. And I assume that
9 they will use that, do the work safely and compliantly
10 with the license requirements for the Certificate of
11 Compliance. And we'll be there to inspect to make
12 sure that they are.

13 MS. CARPENTER: Okay. And my other
14 question was: how many sites has Holtec
15 decommissioned? And by that, I don't mean as a
16 contractor. Excluding that, how many sites has
17 Holtec decommissioned?

18 MS. J. RUSSELL: Holtec International
19 has not decommissioned any sites. However, that
20 said, we have hired Comprehensive Decommissioning
21 International, CDI, which is a company that includes
22 SNC-Lavalin, and they have a rich history of
23 decommissioning nuclear plants and other nuclear
24 facilities.

25 MS. CARPENTER: Thank you.

1 MR. KLUKAN: Again, that was Joy Russell
2 of Holtec, just for the purposes of the transcript.

3 All right. We've now exhausted, as you
4 can see -- this is really good handwriting for me.
5 I'm going to pat myself on the back for this. We've
6 now opened it up -- whatever, I'll take what I can
7 get -- to people who have not yet spoken this
8 evening.

9 So, we don't have an established order,
10 but I think Pine raised her hand first. And then,
11 we'll just go around. Okay?

12 So, again, we'll do three minutes apiece,
13 and then, if we have enough time left over, people
14 may get to do a second round. But let's go first
15 with people who have not yet had an opportunity to
16 speak.

17 So, I turn it over to you.

18 MS. DUBOIS: Thank you, and thank you all
19 for being here.

20 I want to state clearly that I hope
21 Holtec succeeds. I hope Entergy is happy, and I hope
22 the NRC finally wraps its head around sea-level rise,
23 which you are not doing, and that is pretty plain
24 with your reliance on the ~~SEIC~~ [SEIS] and the ~~GEIR~~
25 [GEIS].

1 There is no basis at all for you to accept
2 Entergy's proposal to wait 60 years to clean up the
3 site. That's plainly a fraud.

4 Take a look at the Fourth National
5 Climate Assessment that was released in late October-
6 November. You will be chapter 18 in the Northeast.
7 You will see that our worst-case scenario is, by 2100,
8 we have sea-level rise of 11.5 feet
9 [<https://nca2018.globalchange.gov/downloads/>].
10 That's the new estimate, but daily things are
11 changing so fast and the scientists are learning so
12 much, that that adjustment continues.

13 It is important to the public trust that
14 you regulators and you contractors and Entergy -- oh,
15 Lord -- takes care of us and looks at that. Cleaning
16 up the site does not mean letting it wash into Cape
17 Cod Bay, and in 60 years that's what's going to
18 happen.

19 Even if there's not inundation on the
20 site, the groundwater level will be so high that you
21 will not be able to safely and effectively get the
22 contamination out of the ground. If it goes into the
23 environment, the NRC is failing in its mission to
24 protect the environment and the people. So is
25 Holtec, as a reputable company, I will say. So, is

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Entergy, as a reputable company. You need to address
2 this. The PSDAR for Entergy does not. The Holtec
3 PSDAR does not. And if they run out of money and the
4 cleanup is delayed, we're all in a stew.

5 So, please, NRC, take another look at
6 your regulations. Give it a try at updating that.
7 Call in those scientists that work for the government
8 that wrote that report, and get on the reality page.
9 We've living with it here. Stick around on Sunday.
10 Sunday, Monday, Tuesday, stay here. Go down to the
11 plant then and see what happens.

12 Thank you very much.

13 MR. KLUKAN: Thank you.

14 Again, that was Pine duBois.

15 Just please state your name for the
16 record before you begin.

17 MS. DUBOIS: Pine duBois with
18 [Commonwealth of Massachusetts Nuclear
19 Decommissioning Citizens Advisory Panel] NDCAP.

20 MR. KLUKAN: So, Pine duBois with NDCAP.
21 Thank you.

22 MR. E. RUSSELL: I'm Ed Russell, an
23 elected town meeting member in Plymouth.

24 When businesses as well as governmental
25 agencies engage in big contracts, they usually see to

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 it that there's a bond produced that will guarantee
2 the performance of the contract. And so, I'd like
3 to know why that isn't possible here.

4 MR. WATSON: Performance bonds are used
5 frequently. If we deem that there's sufficient funds
6 to do the decommissioning, we have no need to require
7 them. I think in the recent [Vermont Yankee] VY
8 transfer, Vermont Yankee sale, asset sale and license
9 transfer, one of the conditions we put on -- or the
10 agreement that we got from NorthStar was to provide
11 additional financial assurance. I think it was along
12 the lines of \$30 million to make sure there was
13 sufficient funds. If it's not required, then they're
14 not required. So, it's up to the agreement between
15 the sales, also, to come up with the proper financial
16 information and guarantees.

17 MR. E. RUSSELL: That's your version of
18 risk assessment, but we citizens here have a
19 different assessment of the risk. And when you do
20 have a contract that's just barely enough to cover,
21 and could well exceed the funds available, I would
22 say a prudent entity would look for a bond. And if
23 there is, as you say, a low risk, then the bond should
24 not be that expensive. So, I'd like to see that
25 happen.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 MR. KLUKAN: Thank you.

2 MR. KELLERMAN: So, my name is Bruce
3 Kellerman.

4 I have a question. What happens to the
5 1200-acre site? Who owns it and are there plans for
6 development? And if so, where can we find those and
7 what are their elaborate schemes?

8 MR. TWOMEY: This is Mike Twomey, on
9 behalf of Entergy.

10 When you say the 1200 acres, I assume you
11 mean the 1200 acres of undeveloped property across
12 Rocky Hill Road, correct?

13 MR. KELLERMAN: Yes.

14 MR. TWOMEY: That property currently is
15 owned by Entergy. It is included in the sale to
16 Holtec. And if the license transfer application is
17 approved and the transaction closes, Holtec will
18 become the owner of the 1200 acres. And I have not
19 heard about any specific plans for development of
20 that site at this time, but they would be the owner
21 of the land after the transaction closes, if it
22 closes.

23 MR. KELLERMAN: Does Holtec have plans
24 for the development of the site? It will be
25 paying -- I assume it will be paying property taxes

1 going forward.

2 MS. STERDIS: No specific plans for that
3 property have been defined at this time. And, yes,
4 we will be paying the appropriate property taxes on
5 that site.

6 MR. KLUKAN: Thank you for your
7 questions.

8 MR. DELAFIELD: Yes, I'm Lawrence
9 Delafield. I'm a resident of the Town of Plymouth,
10 a town meeting member, and the President of the Six
11 Ponds Association, which is a local organization very
12 close to the site.

13 And of course, my concern is this: we
14 live in an area that will be in danger until this
15 material is totally removed from the site. Why do
16 we have to wait that long? How can we possibly get
17 that moved up, so that it's removed quicker, or at
18 least provide a major incentive to remove all items
19 from the site? Because we will not be safe until
20 that happens.

21 MR. KLUKAN: Thank you.

22 Okay. Is there anyone else who has not
23 yet spoken who would like to speak this evening?

24 (No response.)

25 Going once, going twice. All right.

1 Is there anyone who has spoken this
2 evening who would like to speak again?

3 MR. LAMPERT: Jim Lampert, resident of
4 Duxbury.

5 I'd just like to spend a moment on
6 comments, and if I'm wrong, I would ask that the NRC,
7 Entergy, and Holtec correct me. My understanding of
8 the transaction, as described in the license transfer
9 application, is that Holtec-Pilgrim will be the owner
10 of the site and will be the one who owns the
11 Decommissioning Trust Fund.

12 In Holtec's license transfer and PSDAR
13 applications, it says that, quote, "The existing
14 Decommissioning Trust Funds provide the appropriate
15 basis for the financial qualifications of Holtec-
16 Pilgrim." It also says that Holtec, quote, "Holtec-
17 Pilgrim will be required to pay for HDI's cost of
18 post-shutdown operations, including all
19 decommissioning costs at Pilgrim." Close quote.

20 It seemed very clear from that that the
21 only potential financial responsibility of Holtec-
22 Pilgrim -- and that is the only one we need to focus
23 on because they are the only licensee -- depends
24 entirely on the Decommissioning Trust Fund.

25 It also seems clear, listening to Mr.

1 Watson, that a statement in a regulation that a
2 licensee that, frankly, has no money and is bankrupt
3 is, quote, "responsible," close quote, provides
4 absolutely no assurance that that licensee will pay.
5 It, frankly, doesn't have any money. And that,
6 unless I missed something that Mr. Watson has
7 said -- and I asked the question earlier -- there is
8 absolutely nothing in NRC rules, regulations, or
9 pertinent law that would permit the NRC to enforce
10 the licensees' and their parents' responsibility to
11 pay for what they caused. Am I correct?

12 MR. WATSON: I will try and respond a
13 little bit here. We owe you a response to your
14 question on the ownership. The only comment I can
15 really make at this point, we will be responsible
16 with the responsible regulations. I have to go to
17 our Office of General Counsel for that.

18 MR. LAMPERT: No, no, I would appreciate
19 your doing that, though.

20 MR. WATSON: Yes. No, we have to do
21 that.

22 The other issue is that we are currently
23 reviewing the license application or plan to start on
24 that very soon. So, we really can't pass any
25 judgment other than the general process we're using

1 and the general requirements for the decommissioning
2 funding and how they would apply to the license
3 transfer. It's we're still doing our review. So,
4 we haven't concluded anything. And so, your comments
5 are valid to that review. And so, I'm sure the staff
6 will take that into account.

7 MR. LAMPERT: Yes, and I would ask that,
8 if in the review or in further conversations with
9 Holtec, the NRC or its staff discovers any way in
10 which there, in fact, is an enforceable commitment or
11 an agreement, that people who have the money will set
12 that money up to pay for the shortfall. I would like
13 to hear about it, and it's quite clear that the
14 Massachusetts Attorney General would also like to
15 hear about it.

16 MR. KLUKAN: Thank you again.

17 MR. TWOMEY: Yes, if I may briefly, Mr.
18 Lampert introduced his remarks by saying that, if we
19 didn't say anything, it meant that we agreed with
20 him. And I can't agree to that, just at least on
21 behalf of Entergy. On behalf of Entergy.

22 MR. KLUKAN: Okay.

23 MR. ROTHSTEIN: Richard Rothstein.

24 Two questions. One for Dr. [Mr.] Watson
25 and one for our Holtec representative, Joy.

1 ~~Dr.~~ [Mr.] Watson, can you qualitatively
2 explain or define, for purposes of releasing the site
3 license, site restoration, what basically is
4 included; what would not be included in the case of
5 the Entergy site? So that people don't get false
6 expectations one way or the other.

7 MR. WATSON: Yes. The Decommissioning
8 Fund requirements from the NRC are for the
9 radiological decommissioning. So, once we would
10 terminate the license after verifying the
11 radiological conditions of the site -- we have an
12 independent contractor we use in many cases to help
13 us with the surveys and verify the radiological
14 residual radioactive levels at the site -- we would
15 terminate the license. If the site restoration is
16 not in the requirements by NRC, because there's a
17 number of approaches you can take to
18 decommissioning -- many of them take into account
19 removing the buildings and turning it back into
20 greenfield. If they submit that to us in their
21 license termination plan, then that's the plan they
22 follow because it's a license amendment.

23 If they choose to do things which some of
24 the other power plants have done, such as Trojan or
25 Rancho Seco, where they actually terminate the

1 license, but leave buildings and stuff still
2 remaining on the site, that's their choice. And
3 after that, it's up to the owner of the facility or
4 the licensee -- and at that point they're no longer
5 the licensee, but the owner of the property -- and
6 the state, to determine when and where they should do
7 the final decommissioning and site -- I should say
8 final site restoration and what those requirements
9 are.

10 MR. ROTHSTEIN: Okay. Thank you.

11 I had the pleasure of sitting in the
12 Holtec predecisional enforcement conference last
13 Wednesday, I believe it was, the four-hour -- and
14 more nuts and bolts were discussed than I could fit
15 in my car.

16 But I wanted to commend Holtec on its dry
17 cask presentation to the NDCAP last fall. I thought
18 it was very informative, and I believe it's on the
19 NDCAP website.

20 Just expanding upon Ms. Lampert's comment
21 earlier about cracks not being able to be fixed in
22 the multipurpose canister at this day and age, one
23 thing I was envisioning, given that premise, has
24 Holtec, for purposes of future design considerations
25 to remedy that kind of unsolvable problem at the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 moment, considered constructing a larger multipurpose
2 cask there to go over the cracked cask? And then,
3 of course, that slightly larger cask could be filled
4 with helium gas as a coolant and sealed. And then,
5 that larger cask would then -- or that larger
6 multipurpose cask with the cracked inside of the
7 other cask, multipurpose cask, getting to a larger
8 overpack, if it need be, with the air vents, too.
9 So, is that a possible design solution that may be on
10 the drawing board from Holtec?

11 MS. J. RUSSELL: That's a very
12 explanation. It's very close to what we've actually
13 designed for recovery of a canister in the event the
14 inspections were to show that there has been a
15 degradation. So, indeed, that is the approach, is
16 to put it into another overpack, but an overpack, not
17 necessarily the canister as you've described. So,
18 you're on the right track, sir. It is definitely an
19 additional overpack that we are going to use.

20 MR. ROTHSTEIN: I'm glad to hear that.
21 Can you tell me who I write to at Holtec to get some
22 royalties?

23 (Laughter.)

24 MS. J. RUSSELL: Right. Royalties and
25 to get on the patent.

1 MS. M. LAMPERT: Can a canister be
2 shipped under current regulations?

3 MR. KLUKAN: Ma'am, are you asking, just
4 so we get it on the transcript, are you asking whether
5 the current canister or the overpack can be shipped?

6 MS. M. LAMPERT: (Off microphone.)

7 MR. KLUKAN: Okay. I just have just
8 given you the microphone.

9 So, essentially, can a cylinder which has
10 been or a canister which has been compromised or
11 degraded, do the regulations allow it to be shipped,
12 is the question that was posed by Ms. Lampert.

13 MS. J. RUSSELL: The regulation question
14 I defer to the NRC.

15 MR. WATSON: I ask Jason Piotter, who is
16 our Senior Engineer for Spent Fuel Safety, to come up
17 and give you an answer for that.

18 MR. PIOTTER: The regulations are
19 performance-based. And so, if you had a canister
20 that had a demonstrated flaw like you're talking
21 about, there would have to be an engineering analysis
22 that was done to determine what the best way to
23 mitigate that particular flaw would be. I can't
24 answer the question right now whether or not it would
25 be allowed to be shipped because we don't have any

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 scenarios where there are flaws such as you describe.
2 So, it's a case-by-case basis, depending upon what
3 the situation is for the canister that you're talking
4 about. But it would have to be evaluated prior to
5 transport. I couldn't just be put into a transport
6 overpack and sent. So, it would have to be an
7 engineering analysis prior to that activity.

8 MR. KLUKAN: Thank you.

9 MS. TURCO: I just want to go back to the
10 Holtec in San Onofre because it could be our future.

11 Diane Turco with Cape Downwinders.

12 At San Onofre, they've been loading,
13 Holtec has been loading canisters in underground
14 vaults on the beach. The sea-level rise is
15 eventually going to leak into the bottom of those
16 vaults. They have been loading them and scratching
17 them. And there was a special inspection by the
18 Nuclear Regulatory Commission
19 [[https://www.nrc.gov/reactors/operating/ops-](https://www.nrc.gov/reactors/operating/ops-experience/songs-spec-insp-activities-cask-loading-misalignment.html)
20 [experience/songs-spec-insp-activities-cask-loading-](https://www.nrc.gov/reactors/operating/ops-experience/songs-spec-insp-activities-cask-loading-misalignment.html)
21 [misalignment.html](https://www.nrc.gov/reactors/operating/ops-experience/songs-spec-insp-activities-cask-loading-misalignment.html)]and it sounded almost like
22 Entergy's special inspection report, pretty much the
23 same.

24 So, I want to know. And the people in
25 California have said, "Let them know the public in

1 Southern California is asking the Holtec System to be
2 recalled." It's a lemon, and Holtec is making
3 loading errors due to mismanagement and bad
4 engineering design that the NRC admits it cannot fix.
5 So, that's what's happening out in California.

6 So, I have two questions. No. 1, how can
7 you come to the NDCAP meeting and say that Holtec has
8 an impeccable safety record when this was all exposed
9 by a whistleblower?

10 And No. 2, would you conduct an
11 environmental impact study, including sea-level rise
12 and acts of malfeasance on the spent fuel pad?

13 MS. J. RUSSELL: Can you repeat the first
14 question again?

15 MS. TURCO: Let me try it this way: how
16 could you with a straight face tell the NDCAP that
17 Holtec has an impeccable safety record when we know
18 what's going on at San Onofre?

19 MS. J. RUSSELL: I appreciate the
20 question. I understand your concern.

21 Let me just state, Holtec does have an
22 impeccable safety record. And the issue that
23 happened at San Onofre, which was reported by the
24 licensee who is the Southern California Edison
25 Nuclear Plant, they went through their process. So,

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Holtec does have an impeccable safety record. I
2 absolutely can emphatically say that.

3 MS. TURCO: Did Southern Edison report
4 this incident when it happened to the NRC?

5 MS. J. RUSSELL: Those questions are
6 best --

7 MS. TURCO: Okay. No, they did not.

8 MS. J. RUSSELL: -- to the Southern
9 California --

10 MS. TURCO: And you can look up on the
11 record they did not. No. Actually, the NRC
12 initiated the special inspection, right, Mr. Watson?

13 MR. WATSON: From what I understand, the
14 licensee was a little late in responding to --

15 MS. TURCO: Yes.

16 MR. WATSON: -- the requirements. And
17 so, based on that, we escalated our inspections to --

18 MS. TURCO: Thank you.

19 MR. WATSON: -- evaluate the situation.

20 MS. TURCO: Thank you. It was a
21 whistleblower.

22 MR. WATSON: But it was not a
23 whistleblower that submitted the complaint.

24 MR. TWOMEY: This is Mike Twomey, on
25 behalf of Entergy.

1 One thing, I think, just to clear up any
2 confusion for those who don't know as much about the
3 issues as some of the recent speakers. One thing
4 that's important to note here is that, if Entergy
5 remains the owner of the facility, we will be using
6 the Holtec dry fuel storage system. If Holtec
7 becomes the owner, they will be using the Holtec dry
8 fuel storage system. So, the license transfer will
9 have no impact on what system is used at Pilgrim for
10 storing spent nuclear fuel. It will be the Holtec
11 dry fuel storage system that we use or they use.

12 And I don't know how that relates to the
13 scope of this particular proceeding, but I do want to
14 make sure that people understand that it's not an
15 "either/or". It's not like, if Holtec becomes the
16 owner, that's the only circumstance under which the
17 Holtec system will be used. That very same system
18 will be used if we remain the owner.

19 I just wanted to clear that up for
20 anybody who may not understand that.

21 MS. TURCO: Right. Yes. Thank you.
22 Right. Because the point is it's both mismanagement,
23 poor equipment, ongoing problems.

24 But the second question was, would an
25 environmental impact study include sea-level rise and

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 acts of malfeasance on the ISFSI pad?

2 MS. J. RUSSELL: First, I want to
3 emphatically state that the system that's in use at
4 San Onofre is markedly different than the one that's
5 in use at Pilgrim. You're comparing apples to
6 oranges. It is correct. It's an above-ground system
7 versus an underground system.

8 MS. TURCO: Oh, no, no. That's not my
9 question.

10 MS. J. RUSSELL: And not the dry storage
11 system.

12 MS. TURCO: That's not my question.

13 MS. J. RUSSELL: And therefore --

14 MS. TURCO: That's not my question.

15 MS. J. RUSSELL: -- there isn't a
16 probability of an issue as you have at San Onofre
17 with water collection in the bottom of the system.

18 MS. TURCO: Okay.

19 MS. J. RUSSELL: It can't happen because
20 they are two different systems.

21 MS. TURCO: Right. But what I'm asking
22 is, would you include sea-level rise for the
23 property, as Pine spoke about, and storm surges, and
24 acts of malfeasance? That's my question.

25 MS. J. RUSSELL: So, the dry storage

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 systems are licensed under Part 72, and they're
2 deployed under Part 72 currently. And they're
3 already being deployed in accordance with the
4 regulatory requirements. There's no additional
5 investigation or analyses that need to be performed
6 for the dry storage systems.

7 MR. KLUKAN: I gave the women a back-and-
8 forth. But, if you know you're going to keep
9 talking, just, for the sake of our poor
10 transcriptionist -- he is not the object of your
11 concern. So, let's make his life easier. So, just
12 speak into the microphone when you're asking
13 questions. Okay?

14 And the question there was, would you
15 include sea-level risk and acts of malfeasance in an
16 environmental assessment or impact statement?

17 MS. J. RUSSELL: We'll meet the
18 regulations. The dry spent fuel storage system is
19 already deployed and it will continue to be deployed,
20 no matter whether this license transfer application
21 occurs or not. I don't understand the question of
22 the need for additional environmental studies related
23 to dry storage.

24 MS. TURCO: You're building a new storage
25 facility there, a brand-new storage facility. Right

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 now, you can drive onto the property, pass the "no
2 trespassing" signs, and eyeball the dry casks. Now
3 you're moving them closer to Rocky Hill Road. We
4 need to be assured that there's going to be some
5 increased security there. So, that's just a
6 question. Are you going to be looking at acts of
7 malfeasance when you do the new pad?

8 MS. J. RUSSELL: The security that's
9 already at the nuclear plant, I allow Entergy to talk
10 to. The security of the dry storage system, under
11 the license under Part 72, has already been
12 established. There's no additional requirements
13 that need to be addressed.

14 MS. HALTER: This is Mandy Halter, on
15 behalf of Entergy.

16 The independent spent fuel storage
17 installation facilities are required to be secure.
18 And with the newly-located pad, there will continue
19 to be a physical barrier behind an intrusion
20 detection system, and monitored 24/7 by armed
21 security.

22 And that's correct; that's all I can talk
23 about, due to safeguards.

24 MS. LYNCH-BENTTININ: Sheila Lynch
25 Benttinin, Duxbury.

1 I have a question about regional public
2 safety. In the last 40-plus years, Entergy was
3 required to do a regional public safety plan, and
4 they've applied with their PSDAR to abandon that
5 regional planning. And we are concerned about Holtec
6 taking over. What is your plans for notifying
7 regional safety folks, like firemen, et cetera, on
8 safety, particularly with the expedited four-year
9 plan that you presented tonight?

10 MS. STERDIS: This is Andrea Sterdis.

11 We will continue to comply with all NRC
12 regulation. And I want to emphasize that it is
13 Holtec's top priority to maintain the health and
14 safety of the public.

15 MS. LYNCH-BENTTININ: But what I'm
16 asking, in particular, is, what is your plan to reach
17 out to regional safety folks, like firemen and
18 regional coordinators, as your expedited four-year
19 plan is ongoing?

20 MS. STERDIS: And again, I will emphasize
21 that we will maintain the health and safety of the
22 public, and we will be complying with all
23 regulations.

24 MS. LYNCH-BENTTININ: And my second
25 question is, can NRC add to their PSDAR another level

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 of regional safety outreach to public safety
2 officials?

3 MR. WATSON: If I understand your
4 question correctly, there's no need to add anything.
5 Because the site is still going to maintain an
6 emergency plan and emergency response capabilities,
7 along with security response plans, which have those
8 communication tools in them that they're required to
9 have. So, they're going to continue those things
10 until the decommissioning is complete. So, there's
11 really no need to change those plans.

12 Now I can't specifically talk to the
13 regional plan. I'm not familiar with it. It was not
14 an NRC requirement that I know of. But there are
15 requirements for notification and security/police
16 support; also, fire protection and fire response,
17 medical emergencies and medical responses to the
18 site. And so, those things all stay in place.

19 MS. LYNCH-BENTTININ: But Entergy has
20 requested that they be discontinued in the regional
21 capacity.

22 MR. WATSON: All I know is they have to
23 meet the minimum requirements for the NRC, which
24 means they will maintain the ability to talk with,
25 get notification of the response capabilities from

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 local and state law enforcement. They will continue
2 to deal with, communicate with the local fire
3 departments and rescue squads.

4 MS. LYNCH-BENTTININ: Would they be
5 required to coordinate --

6 MR. WATSON: The regional, there's no NRC
7 requirement for a regional response plan.

8 MS. LYNCH-BENTTININ: Okay.

9 MR. WATSON: There is one for the
10 immediate location around the plant.

11 MS. LYNCH-BENTTININ: Thank you.

12 MS. MILLER: Claire Miller from Toxics
13 Action Center.

14 I'm getting really agitated because this
15 really matters a lot to me. And if I understand what
16 Diane is bringing up correctly, and your response,
17 Ms. Russell -- it's kind of hard to read your name
18 tag from here; sorry if I got that wrong -- it's that
19 we have rapidly upchanging data on climate change,
20 the impacts of sea-level rise that are getting worse
21 every time they're updated. We have someone in the
22 White House who's changing world politics and
23 dynamics rapidly, and we are living in an age in which
24 terrorism is ever present. And we want to know, are
25 you willing to go above and beyond, if necessary, or

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 are you only willing to do as much as -- like the
2 floor of what's required?

3 Because what I hear Diane asking is, are
4 you willing to go above and beyond to protect our
5 health, our community? And what I hear you saying
6 back is, "We're doing with it what's written. We're
7 just going to do what's necessary, what the law is."
8 Am I understanding correctly? You're committing to
9 the floor?

10 MR. WATSON: I just want to respond to
11 that, and that the NRC regulations fully provide for
12 safety for the people working at the plant, the
13 public, and the environment. And so, complying with
14 those is one demonstration that the plant is
15 maintained safe, and we'll continue to inspect that
16 plant against those requirements.

17 MS. MILLER: I have no doubt that the NRC
18 is doing the best that it can to protect the health
19 and safety of my community. I also know that we're
20 in a rapidly-changing world. And I am interested to
21 know if Holtec is committing to the floor of what the
22 NRC -- like where we're at the last time those laws
23 were passed, those statutes, those regulatory
24 processes we went through, those elaborate commenting
25 periods, or if they're committing to respond to an

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 ever-present, fast-changing world of climate change
2 and terrorism.

3 MS. J. RUSSELL: I think what you're
4 asking me is, am I confident that our dry spent fuel
5 storage system is safe.

6 MS. MILLER: No, that's not what I'm
7 asking you at all. It's not what I'm asking you at
8 all.

9 MS. J. RUSSELL: I am personally
10 convinced -- I am a nuclear engineer. I am part of
11 the design team that designed this dry storage
12 system. And I am confident in its robustness. I'm
13 confident that we have gone above and beyond to ensure
14 that we selected materials --

15 MS. MILLER: I am --

16 MS. J. RUSSELL: -- that we've selected
17 the methodologies, and we have done the absolute
18 utmost we can to ensure the health and safety.

19 MS. MILLER: I have no doubt that you're
20 sincere --

21 MS. J. RUSSELL: May I please finish?

22 I live by these nuclear plants as well,
23 and I am confident that, when I go to visit these
24 plants -- I live by these plants; I live by where our
25 dry storage systems are deployed -- I am personally

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 confident that my company has done everything it can
2 to go above and beyond. And therefore, I have
3 answered your question.

4 MS. MILLER: That wasn't my question in
5 the slightest. I do believe you're 100 percent
6 sincere when you say that. I also believe that the
7 engineers who worked on Chernobyl, Three Mile Island,
8 and Fukushima were also really sincere in believing
9 that their plants were safe as well.

10 I just want to say for the record you
11 didn't answer my question.

12 MR. KELLERMAN: So, Bruce Kellerman
13 again.

14 My question is to Holtec. As I
15 understand the fund, it can go up and down. It's
16 like a 401(k), right? It's an investment vehicle.
17 What happens if it goes down? And also, could you,
18 would you sue the Department of Energy, as others
19 have done, for failing to take the waste offsite?
20 Would you plan to do that? Are you?

21 MR. WATSON: Well, let me respond to the
22 first part. Yes, there are market changes. The
23 Trust Fund is in an independent trust with an
24 independent trustee. Most of them are with Mellon
25 Bank of New York. So, the trustee has certain

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 requirements on them to make conservative investments
2 to protect the fund.

3 Secondly, all the licensees that are
4 storing fuel -- I'll say broadly "everyone" -- has
5 the ability to request or sue, if they have to, the
6 Department of Energy to get the cost back for the
7 storage of the nuclear fuel. So, I'm sure Entergy
8 has done that in the past for their plants. I'm sure
9 Holtec will do the same to recoup the costs. Those
10 costs are, then, available for doing other activities
11 at the sites. And so, that's part of the agreement
12 with the federal government.

13 MR. KELLERMAN: Thank you.

14 MS. LAMPERT: Two points. NRC is giving
15 exemptions. So, the DTF can be used for spent fuel
16 management costs. Now go back. The Decommissioning
17 Trust Fund was established when we were a utility
18 structure -- Boston Edison was the owner -- by
19 ratepayers. Since that time, it's grown from
20 investments. Entergy didn't put a dime in it.
21 Holtec won't put a dime in it. Okay?

22 Then, they will sue DOE to recoup what
23 they've spent on spent fuel management costs, okay,
24 what they've spent by taking it out of the
25 Decommissioning Trust Fund. But, then, when they get

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 the money out of DOE, there's no requirement to put
2 it back. If there is, please correct me and give me
3 the regulation. Instead, they put it in their
4 pocket. And that's, you know, if I were Holtec, I'd
5 say, "I'm going to make a pile of money doing this."
6 And that's part of the incentive to take over the
7 license.

8 It would seem to me that the NRC would
9 get on the stick and make some sort of
10 requirement/regulation that it goes back into the
11 Decommissioning Trust Fund to refurbish what they
12 have taken out. Because there's no requirement?
13 Correct that.

14 And then, I just want to sum up by saying,
15 the points brought forward on sea-level rise, the
16 points brought forward on the increased risk of
17 terrorism, of cyberattack -- now that's a big one
18 when you think of the spent fuel pool. All these new
19 and significant information that you should be
20 responsible, NRC require that they do a NEPA review,
21 and then, not say what is blatant foolish. It's a
22 lie to say the 2002 Generic Environmental Impact
23 Statement and the 2006 Impact Statement done during
24 relicensing bound environmental impact, so we can all
25 skip along and say it's a clean site; we've done our

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 job. So, they really don't have to spend a dime, and
2 all the stuff can go in Cape Cod Bay. Dilution is
3 the solution.

4 MR. KLUKAN: Thank you.

5 MR. WATSON: I just want to make one
6 comment, that the Decommissioning Funds that
7 are -- or excuse me -- the spent fuel funds that are
8 recuperated from the Department of Energy, I think
9 it's 50.82, Mike, in the regulations, the fund. The
10 money goes back into the fund. No? It doesn't?
11 Okay.

12 PARTICIPANT: It goes to the company.

13 MS. LAMPERT: No, it's a good thing for
14 them to make money.

15 MR. WATSON: Okay. Well, I'm sorry. I
16 appreciate the comment then. We have to look at
17 that.

18 MR. KLUKAN: Before you begin, is there
19 anyone else in the audience who has not yet had an
20 opportunity to speak who would like to do so?

21 (No response.)

22 Okay, please. Would you mind letting her
23 go first? Okay. Thank you, sir.

24 Your name for the record, please.

25 MS. GARRY: Joanne Garry. I live a mile

1 from the plant. I've been here since I was 16. So,
2 I saw it built by people that shouldn't be building
3 it. But that's not my question.

4 My question is twofold. First of all,
5 Entergy owns it, correct? Got the license. Owns
6 all the property. How much is it worth? What's the
7 property worth? What did Entergy get or might get
8 from Holtec, the cost, the dollars? Are you selling
9 it for money? So, there's no money exchange?
10 Entergy walks away. Holtec, if it gets the license,
11 walks in, correct?

12 So, why does Holtec want this? Well,
13 that's my question. Why does Holtec want this really
14 horrible thing to fix? We've got thousands of people
15 on the line. So, what's the deal? Why are you doing
16 this? No answer?

17 MS. STERDIS: This is Andrea Sterdis, and
18 I will make this a personal response.

19 As a mother of two children and a
20 grandmother of four children, I am committed to us
21 doing in this industry what is right. And that is
22 to take care of our plants when they're past their
23 operational life expectancy and to turn that property
24 back into a useful piece of property in the community.
25 So, that is my personal reason for being involved in

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 this project.

2 MS. GARRY: But it's in it for the money.
3 So, the money, you're going to own 12,000 acres.
4 Twelve hundred acres. You've got a big hill there
5 that hasn't been developed. Why not move all this
6 terrible spent fuel to the top of the hill? If you're
7 going to move it; move it, move it away from the ocean
8 or bury it in the hill -- I don't know -- a better
9 solution than moving it next to Rocky Hill Road, which
10 I go by every day. So, I mean, it just seems simple
11 solution. If you can't move it away, move in a safer
12 area.

13 But, again, you're going to be making big
14 bucks here. So, we want to be safe.

15 That's all I have to say.

16 MR. KLUKAN: Before we begin, because we
17 do have -- I'm sorry for interrupting you again, sir.
18 Just because we do have extra time -- I don't usually
19 intervene like this, but I think there's some
20 confusion out there regarding what's the financial
21 arrangement between -- and I'm not asking in specific
22 terms -- but what's the financial relationship
23 between Holtec and Entergy?

24 And I think the question was asked like,
25 how would Holtec benefit from this transaction? And

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 I think if we could answer that, that would go a long
2 way to clearing up some of the confusion in the
3 audience.

4 MR. TWOMEY: This is Mike Twomey for
5 Entergy. I'll address the specific question of the
6 way the transaction is structured.

7 Entergy is receiving only nominal
8 consideration. And I have to say I don't have the
9 number in front of me. We just recently closed the
10 Vermont Yankee transaction, and the nominal
11 consideration there was a thousand dollars.

12 And we receive nominal consideration.
13 Holtec receives title to the plant or they're
14 actually buying Entergy Nuclear Generation Company
15 through an equity sale. They get that company which
16 owns the plant, has the Decommissioning Trust Fund
17 and the liability for the decommissioning.

18 So, what Entergy gets out of the
19 transaction is a thousand dollars. And we are no
20 longer involved in the decommissioning of the plant,
21 in the same way that Boston Edison is not involved in
22 the decommissioning of the plant. All right. We're
23 going to transfer that responsibility to Holtec, and
24 Holtec will receive the project, the plant, the
25 Decommissioning Trust Fund, and the work associated

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 with it.

2 And I'll let Holtec describe why they
3 would be willing to take this work on, as other
4 companies have taken it on in other parts of the
5 country.

6 MS. J. RUSSELL: Again, this is Joy
7 Russell from Holtec.

8 Holtec is, and has been for 30 years, an
9 industry leader in safe and secure storage of spent
10 nuclear fuel. We also have other business endeavors
11 such as designing a small modular reactor. And as
12 we've pointed out this evening, we also have
13 submitted an application to establish a consolidated
14 interim storage facility in southeast New Mexico.

15 Holtec is committed to the nuclear
16 industry. And unfortunately, part of that also
17 includes the safe decommissioning of nuclear power
18 plants.

19 We recently built our third manufacturing
20 facility here in the United States. We now have 1.4
21 million square feet of manufacturing here in the
22 United States. We're the largest exporter of nuclear
23 products. And again, that's a demonstration of our
24 commitment to the nuclear industry.

25 So, that is Holtec's reason for taking

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 the next step and to acquire shuttered nuclear plants
2 and to safely decommission those; and to take the
3 ownership of the spent nuclear fuel, which is also
4 our core expertise, and to manage that as it remains
5 either onsite or is moved to New Mexico.

6 MR. KLUKAN: Thank you.

7 And thank you, sir, for indulging me for
8 that minute.

9 MR. ROTHSTEIN: I've got all the time in
10 the world.

11 A final question for ~~Dr.~~ [Mr.] Watson.
12 I was hoping that NRC's proposed revised
13 decommissioning regulations were going to come out
14 last November, as originally envisioned, and that
15 final promulgation would have taken place sometime in
16 the first half of this year. Notwithstanding the
17 current government shutdown, what is NRC's [estimated
18 time of arrival] ETA for when it was envisioning
19 getting these proposed and final regulations out?

20 And a second question is, licensees who
21 have submitted their PSDARs, even if they're in the
22 process of being evaluated, or the NRC said, okay,
23 they're good enough, so you can start the
24 decommissioning process once the plant is permanently
25 shut down, would existing licensees in those

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 circumstances get grandfathered separate from the new
2 regulations for decommissioning? Or would it be
3 like, for example, a post-Fukushima, where the NRC
4 says, okay, we've come up with this and the new
5 regulations; therefore, all licensees must do blank,
6 blank, blank for decommissioning, regardless of what
7 was in your PSDAR?

8 MR. WATSON: Let me respond to the
9 rulemaking schedule. The proposed decommissioning
10 rulemaking that's been in progress over the last few
11 years, the staff made its scheduled requirement to
12 submit to the Commission the proposed rules and the
13 basis for those proposed rules back in May. As many
14 of you may know, we also had two new Commissioners
15 appointed by the Administration. And based on that,
16 they've been taking care of the backlog of
17 information or voting issues that they have on their
18 plate.

19 So, the staff is waiting for the
20 Commission to do their job. So, it's the
21 Commission's priority to address their work at their
22 own schedule. So, the staff is waiting for the
23 Commission to vote on it. We have not received a
24 schedule of when that vote is to take place. And so,
25 we are basically at the mercy of the Commission for

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 meeting the time limit requirements they had
2 originally placed on us to have these rules in place
3 by the end of 2019 [[https://www.nrc.gov/reading-](https://www.nrc.gov/reading-rm/doc-collections/rulemaking-ruleforum/active/RuleDetails.html?id=49)
4 [rm/doc-collections/rulemaking-](https://www.nrc.gov/reading-rm/doc-collections/rulemaking-ruleforum/active/RuleDetails.html?id=49)
5 [ruleforum/active/RuleDetails.html?id=49](https://www.nrc.gov/reading-rm/doc-collections/rulemaking-ruleforum/active/RuleDetails.html?id=49)].

6 So, we will, hopefully, resolve the issue
7 with a Commission vote. That will give us the
8 direction on how we are to proceed with the proposed
9 rules.

10 One of the proposed evaluations was
11 looking at the PSDARs. If there is a change in the
12 regulations that the Commission wants concerning the
13 PSDARs, then we will issue the regulations and the
14 guidance with that. And anybody that would come out
15 in the future would have to comply with the new
16 regulations. Since the plants that are already in
17 decommission have submitted their PSDAR, if they were
18 to revise that, we would believe they would have to,
19 at least I would believe that they would have to
20 comply with the new requirements.

21 So, I think I answered both questions.
22 But we're at the mercy of the Commission and their
23 vote scheduling. And apparently, they have more
24 pressing issues than the decommissioning rulemaking.

25 MR. LAMPERT: Jim Lampert, Duxbury.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 I've spent a lot of time thinking and
2 trying to figure out the answer to the question why
3 would Holtec get into this. And in addition to the
4 fact that it's your business, I think the obvious
5 answer is they expect to make a profit.

6 And if you ask yourself on what basis do
7 they expect to make this profit, a number of things
8 that I think are fairly clear, if you look at the
9 whole picture, come to mind. And to the extent
10 anybody, Holtec disagrees with me, and you think you
11 can, consistent with the limitations of what you can
12 say, correct me; please do so.

13 The first is they obviously think they're
14 a great deal more efficient at doing this type of
15 thing than Entergy ever will be.

16 The second is they want to get the
17 decommissioning done early to avoid the risk of
18 drastically-increasing costs that could
19 be -- "destructive" is a nice word -- if they waited
20 the period of that Entergy was planning to wait.

21 The third is that I was told by a Holtec
22 representative that their profit is included in the
23 costs you see in their PSDAR.

24 And last, just talking to various people
25 in the industry, my understanding is that, before

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 someone will get into something like this, they
2 really need a fairly clear path to what they see as
3 a 25- to 35-percent profit.

4 MR. KLUKAN: Thank you.

5 MS. CARPENTER: Susan Carpenter with
6 Cape Downwinders.

7 This has nothing to do with money, but it
8 has to do with ethics. Recently, I know that Holtec
9 changed the design of its casks for San Onofre and
10 did not notify anyone, and that it really took
11 Southern California Edison and Entergy by surprise.
12 And I'm wondering if Holtec, having basically gotten
13 away with it because it was eventually approved, if
14 they feel that they can do that here or if there's a
15 likelihood they'll do that in the future, and we'll
16 end up with something different than what we've
17 negotiated for.

18 MS. J. RUSSELL: The statements that you
19 just made I need to disagree with. They're
20 incorrect. I'll correct them.

21 The design of the system was not changed
22 for San Onofre
23 [[https://www.nrc.gov/reactors/operating/ops-
24 experience/songs-spec-insp-activities-cask-loading-
25 misalignment.html](https://www.nrc.gov/reactors/operating/ops-experience/songs-spec-insp-activities-cask-loading-misalignment.html)].

1 Actually, the amount of time it would
2 take me to actually correct all of your statements is
3 going to exceed the time we have, and I would hate to
4 do that, so that other speakers to have an opportunity
5 to speak.

6 I'd recommend that you go and listen to
7 the NRC's [pre-decisional enforcement conference] PEC
8 Conference that was held last Wednesday, the 9th of
9 January. It explains the entire process. But you've
10 incorrectly characterized that.

11 MS. CARPENTER: May I send you the
12 article where I got the information?

13 MS. J. RUSSELL: I didn't hear what she
14 said.

15 MR. KLUKAN: May she send you the article
16 where she learned of this information?

17 MS. J. RUSSELL: Absolutely.

18 MS. JANDA: Just to clarify for the
19 transcript, the PEC video -- I hope I'm not restating
20 this -- is available on the NRC website. I think
21 it's video.nrc.gov, will be the quickest way of
22 getting there [<https://video.nrc.gov/>].

23 MS. CARPENTER: This is the Orange County
24 Register. The title is, "NRC and Holtec to Face Off
25 Publicly Over Redesign of Spent Fuel Canisters at San

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Onofre Plant".

2 I wonder if, are they wrong in their
3 headline?

4 MS. J. RUSSELL: I'm sorry, re-read the
5 headline again?

6 MS. CARPENTER: "NRC and Holtec to Face
7 Off Publicly Over Redesign of Spent Fuel Canisters at
8 San Onofre Plant"
9 [[https://www.ocregister.com/2019/01/02/nrc-and-
10 holtec-to-face-off-publicly-over-redesign-of-spent-
11 fuel-canisters-at-san-onofre-plant/](https://www.ocregister.com/2019/01/02/nrc-and-holtec-to-face-off-publicly-over-redesign-of-spent-fuel-canisters-at-san-onofre-plant/)].

12 MS. J. RUSSELL: The headline is
13 misleading. We didn't redesign the canister for San
14 Onofre. And again, it's a lengthy discussion, and
15 it's all captured in a video from the PEC Conference
16 on January 9th, where Holtec had a meeting at the NRC
17 Headquarters.

18 MS. CARPENTER: From what I understood,
19 they have a difference in the canisters. But it was
20 aware of, down at the bottom there were bolts added,
21 and that design was only discovered when one of the
22 bolts was loose in the canister.

23 MS. J. RUSSELL: Again, you're making
24 misstatements, and we could go back and forth all
25 evening on this. I recommend that you get your facts

1 from this PEC video from the January 9th meeting.

2 MS. CARPENTER: Okay. And I will
3 recheck with the newspaper as well.

4 Thank you.

5 MR. KLUKAN: Thank you.

6 MR. DELAFIELD: This is Lawrence
7 Delafield again.

8 I didn't really get an answer to my
9 question. So, I'd like to restate it in a slightly
10 different way.

11 The question -- and it was a
12 question -- is there any way at this point in this
13 process that we could require that the material be
14 removed and put in a secure facility someplace else,
15 such as you're talking about doing in New Mexico, and
16 get it away from the community? Because we will not
17 be safe until that happens. Or, if that's not the
18 case, is there any way to give an incentive so that
19 it gets removed faster and moved to another location?
20 I did not receive an answer to that. So, I'd
21 appreciate getting an answer.

22 Thank you.

23 MR. TWOMEY: This is Mike Twomey, on
24 behalf of Entergy. I'll answer that because we're
25 the current owner of the facility.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 I believe what your question is when you
2 talk about the material, you're referring to the
3 spent nuclear fuel. And the answer to that is, the
4 United States Federal Government is responsible for
5 removing the spent nuclear fuels from the Pilgrim
6 site and every other nuclear site in the country.
7 And the federal government has repeatedly breached
8 its obligation to do so. And many of us have been
9 required, not personally, but Entergy has been
10 required to sue the federal government for failing to
11 fulfill its obligation.

12 So, the only answer I can give you is
13 that -- I know there were some representatives of
14 some federal Congressmen here tonight -- it is to
15 talk to them about when the federal government is
16 going to fulfill its obligation to remove spent
17 nuclear fuel from the Pilgrim site as well as the
18 other sites in the U.S.

19 MR. KLUKAN: All right. So, it's 8:47.
20 We're scheduled to go to 9:00 p.m.

21 Is there anyone who would like, who has
22 not yet spoken who would like to make any additional
23 comments before we close this out?

24 (No response.)

25 Going once, going twice. All right.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Before I turn it over to Bruce to close
2 out the meeting, I would just like to thank all of
3 you for attending, personally from the facilitators,
4 and to say, out on the registration table there are
5 feedback forms. Donna and I would greatly appreciate
6 you filling those out. We use your feedback in
7 trying to make these meetings better in terms of
8 public process. So, please take a couple of minutes
9 to do so.

10 And with that, I'll turn it over to
11 Bruce.

12 Thank you.

13 MR. WATSON: Well, the first thing I want
14 to thank you for is coming out tonight. I know this
15 is an important issue to many of you.

16 Your comments will inform the staff on
17 the NRC's review of the PSDAR. I heard some very
18 good comments for our consideration. And then, when
19 we look at the license transfer request and the
20 application and its PSDAR, those comments can also be
21 taken into account there.

22 As a reminder, you could provide written
23 comments, I believe it's through March 21st. We will
24 be publishing The Federal Register notice on the
25 license transfer when the rest of the federal

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 government goes back to work. The comment period,
2 again, is going to be 30 days for that and 20 days
3 for hearings. So, you're hearing about it early
4 before the notice is published. So, we look forward
5 to your comments.

6 Again, I want to thank you for your
7 comments and questions. We will be, at least I will
8 be, and a couple of the other NRC will be, at the
9 Massachusetts Nuclear Decommissioning Citizens
10 Advisory Panel tomorrow evening. So, I'm sure we'll
11 be having some more discussions on the topic.

12 So, with that, I would thank our
13 panelists and our presenters for their presentations
14 and in answering questions where we could.

15 With that, I would adjourn the meeting.
16 Thank you very much.

17 (Whereupon, at 8:49 p.m., the meeting was
18 adjourned.)

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

SUBJECT: TRANSCRIPT FOR PUBLIC MEETING HELD ON JANUARY 15, 2019, IN
PLYMOUTH, MASSACHUSETTS REGARDING SEABROOK NUCLEAR
POWER STATION POST-SHUTDOWN DECOMMISSIONING ACTIVITIES
REPORT AND LICENSE TRANSFER APPLICATION (EPID L-2018-LLL-0031)
DATED FEBRUARY 7, 2019

DISTRIBUTION:

PUBLIC

RidsACRS_MailCTR Resource

RidsEdoMailCenter Resource

RidsNrrDorLp1-2 Resource

RidsRgn1MailCenter Resource

RidsNrrMailCenter Resource

SWall, NRR

RidsNrrLAJBurkhardt

LBurkhardt, OEDO

BWatson, NMSS

DScrenci, OPA

RidsNrrDorLResource

JJohnston, NRR

ASnyder, NMSS

ADAMS Accession Nos.:

Package: ML19031B992

Memo: ML19031B825 *by e-mail

Corrected Transcript: ML19031C835

OFFICE	DORL/LSPB/PM	DORL/LSPB/LA	DORL/LSPB/BC (A)	DORL/LSPB/PM
NAME	JLamb	IBetts	MOrenak	SWall
DATE	1/31/19	2/6/19	2/7/19	2/7/19

OFFICIAL RECORD COPY