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**To:** [Docket Hearing](#)  
**Cc:** ["JANET AZAROVITZ"](#); ["Mary Lampert"](#); [ago@state.ma.us](mailto:ago@state.ma.us); [Jack Priest](#); ["David Agnew"](#); ["Bruce Taub"](#); [seth.schofield@mass.gov](mailto:seth.schofield@mass.gov)  
**Subject:** [External\_Sender] RE: Docket ID NRC-2018-0279 Pilgrim Nuclear Power Station: Consideration of Approval of Transfer of License and Conforming Amendment  
**Date:** Monday, February 25, 2019 6:38:56 PM

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As a resident of Massachusetts, and a member of the Pilgrim Legislative Advisory Coalition (PLAC), I am writing to support the request by the Commonwealth of Massachusetts that the NRC permit the Commonwealth to intervene in this proceeding and grant the Commonwealth's request for an adjudicatory hearing on Entergy Nuclear Operations, Inc and Holtec International's License Transfer Application, Holtec's unconditioned Exemption Request to use Pilgrim's Decommissioning Trust Fund for site restoration and spent fuel management costs, and Holtec's Revised Post-Shutdown Decommissioning Activities Report (PSDAR). The full details of this petition by the Commonwealth has been presented to you in a document dated February 20, 2019 and signed by Attorney General Maura Healey, Senior Appellate counsel Seth Schofield, and Assistant Attorney General Joseph Dorfler.

PLAC fully supports this request for the Commonwealth to intervene in this process. The Commonwealth and its citizens have a direct and ongoing interest in all aspects of the decommissioning, spent fuel management, and site restoration of Pilgrim. As a physician Board Certified in Occupational and Environmental Medicine, and a resident of Yarmouth Port on Cape Cod, about 20 miles southeast of Pilgrim, I have a particularly keen interest in these issues related to Pilgrim.

The Commonwealth will continue to be burdened by the legacy of Pilgrim and the spent nuclear fuel stored onsite for decades, if not centuries to come. In order to fully restore the site, all spent nuclear fuel must be removed. If not properly managed, unforeseen site complications could lead to cost overruns and long-term, yet unknown health, safety and environmental effects. The Commonwealth and its citizens have ongoing financial, health, safety, and environmental concerns about the decommissioning of Pilgrim that must be adequately addressed before that process is allowed to go forward.

I will not reiterate here all of the arguments put forward in the Commonwealth's request to intervene. I would only highlight the Commonwealth's contention that Entergy and Holtec have not presented sufficient evidence to the NRC of adequate financial assurance to meet the statutory and regulatory requirements for the proposed License Transfer Application. The applicants failed to provide sufficient evidence to demonstrate that, if approved, there will be reasonable assurance of adequate protection for public health and safety required by Section 182(a) of the Atomic Energy Act (42 U.S.C. § 2232(a)).

Also, the LTA request, Exemption Request and Revised PSDAR do not comply with 10 C.F.R. § 50.82 (8)(i)(B) and (C).

The final point I would like to highlight is that the LTA and Amendment Requests do not include the Environmental Report required by 10 C.F.R § 51.53(d), and have not undergone the environmental review required by the National Environmental Policy Act and 10 C.F.R. §§ 51.20, 51.70 and 51.101.

For an in depth discussion of all of these points, I refer you to the request by the Commonwealth of Massachusetts to intervene in this proceeding, which you have already received. The health and safety of citizens residing in all of Southeast Massachusetts, and the safety of our unique, fragile, and precious environment are at stake here.

Thank you for this opportunity to provide input into this proceeding.

Sincerely,

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February 25, 2019