

Chairman Resource

From: Aaron Frederick <afrederick1@me.com>
Sent: Monday, November 29, 2021 1:25 PM
To: NRCExecSec Resource; Chairman Resource; CMRBARAN Resource; CMRWright Resource
Cc: amanda beal; dfraser@capecodonline.com; seth.pickering@mass.gov; emiller@gmri.org; Amanda.Beal@maine.gov; jared.silva@mass.gov; p.obrien@cdi-decom.com; r1web.mail@epa.gov
Subject: [External_Sender] 1, 000, 000 gallons of radioactive water into the Gulf of Maine

Dear esteemed Commissioners of the Nuclear Regulatory Commission,
Cc: leaders of affiliate agencies and departments.

I spoke at length with Mr. Pat O'Brien this morning, Senior Manager of Government Affairs and Communications for Holtec, the company responsible for decommissioning the Pilgrim Nuclear Facility in Plymouth, MA. I'm grateful for Mr. O'Brien's time in helping me better understand the process and steps being taken to close and stabilize the facility.

I understand that the governing agencies, including the Commissioners or the NRC, MA DEP, the Regional EPA, and others seek to find the safest and cleanest solutions for dealing with the accumulated radioactive waste at the Pilgrim Site, including disposal of the 1 million + gallons of coolant water that will be disposed once the final waste is removed from the cooling pools over the next months. As was published recently in the [Cape Cod Times](#) one of the possible, though perhaps unlikely strategies would be to 'clean' this fluid and overboard it into the Gulf of Maine. Given the unique bathymetric shape of the Gulf of Maine, the Gulf is comprised of many circulatory gyres that cause its waters to mix and spin and spiral throughout recovering fisheries and fragile ecosystems. These waters would cycle around Georges Bank, a marine protected area once home to some of the most abundant fisheries in Atlantic, which are currently recovering from decades of overfishing. These waste waters, even blended and diluted, could cycle back into the Bay of Fundy and pass along the Maine Coast with impact that may not be measurable, but indeed palpable as yet one more form of non-source point pollution.

Mr. O'Brien is a resident of the Plymouth area. He understands better than most the care that is needed to protect society and the natural resources we depend on from the dangers of radioactive waste. I understand that trucking this waste over public highways and byways presents its own challenges and complexities. The situation is not simple, and I appreciate the complex factors that you must weigh as you make the best decision for dealing with the Pilgrim Nuclear site, as has been the case with Vermont Yankee and Maine Yankee and many other decommissioned sites before it.

Thank you for doing what you can to avoid dumping this waste into our fragile oceans. The pressure of increasing PH, warming waters and overfishing are already taxing the Gulf of Maine marine systems that we rely on. The natural resource managers, many cc'd or bcc'd into this message, are working hard to help these systems sustain and even bounce back amid global changes in climate. Please find an alternate approach to handling this waste that can keep it out of our water and food cycle.

With gratitude and respect,

Aaron Frederick
207.650.5215
aaron@aaronfrederick.com