

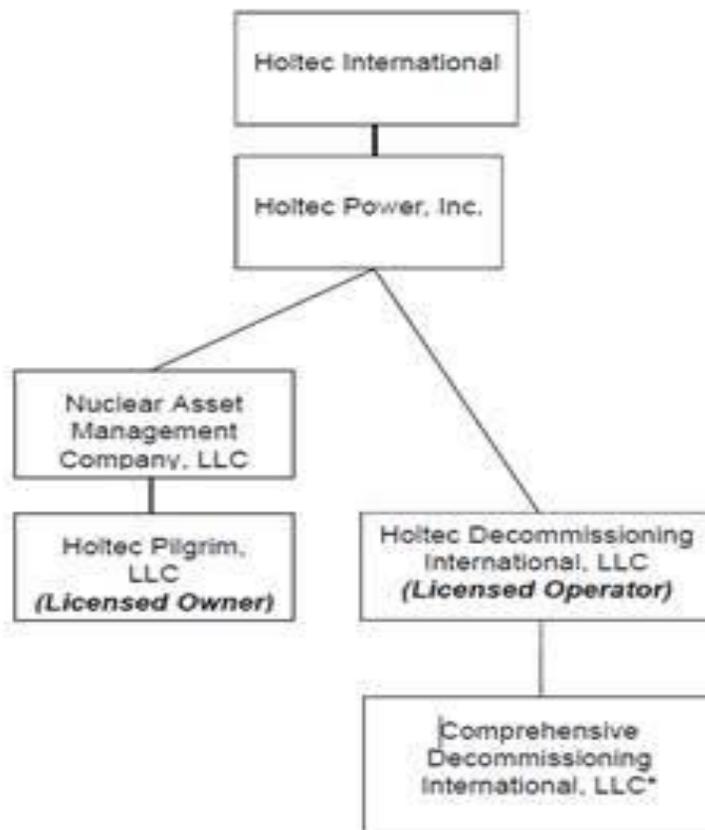
Pilgrim Response to Decommissioning Questions

1) **What is the status of decommissioning at each facility?** Who (which decommissioning specialist or other entity) did or is doing the decommissioning and what method(s) did/are they using (SAFSTOR or DECON). How long did/do they predict it will take?

Sale approved to Holtec, estimated time frame 8 years. Work will be done by CDI- Holtec responsible for spent fuel, SNCL for demolition and soil remediation.

Organization chart from LTA

Figure 2: Simplified Organization Chart (Post-Transfer)



Note:

* Comprehensive Decommissioning International, LLC ("CDI") is jointly owned by Holtec (through its subsidiary, Holtec Decommissioning International, LLC ("HDI"), the majority owner) and SNC-Lavalin (through its subsidiary, Kentz USA, the minority owner). HDI will contract with CDI through a Decommissioning General Contractor Agreement.

Decommissioning issues- Spent Fuel Storage:

Which canisters were used? Did the reactors use High Burnup fuel? How long did spent fuel stay in the fuel pools before it was transferred to dry cask storage? Was Hardened onsite storage (HOSS) considered? How long do you anticipate the waste will be stored on site?

Casks: Pilgrim is using Holtec Hi-Storm 100, Version B, MPC-68 casks to eventually hold and store 61 dry casks. Additional casks likely to store Greater-Than-Class-C radioactive waste that must go to a deep geological

repository too. The cask system is comprised of three primary components: MPC-68, HI-TRAC 100 D, and HI-STORM 100S. The MPC-68 is a metal canister that has a storage capacity of 68 BWR spent fuel assemblies. The HI-TRAC (transfer cask) is a metal transfer cask that provides a means to lift and handle the canister as well as providing radiological shielding of the spent fuel assemblies. The HI-STORM 100-S Version B storage overpack is a stainless steel-encased concrete storage cask that provides physical protection and radiological shielding for the metal canister when in storage. The storage cask is vented for natural convection to dissipate the spent fuel decay heat. The casks are stored in a vertical position outdoors on a storage pad- anticipate fuel out pool 2021, defueled June 9, 2019

HBU: Yes

Transfer to Casks: 2017

HOSS was not considered. Casks are stored vertically on concrete pad with no barriers -- 362 feet from a public road.

How long will fuel be stored On Site: PSDAR says fuel will start moving 2030 and will be completely offsite 2063. The more likely scenario is NRC's Continued Storage Rule statement that spent fuel may remain onsite indefinitely and it set requirements for 100, 200, and 300- year onsite storage.

2) **Decommissioning Trust Fund:** How much was/is it? Is that adequate? Were any waivers issued to use for fuel storage rather than decommissioning?

\$1.03 Billion

Both the Commonwealth and Pilgrim Watch filed motions to intervene in the license transfer and requests for hearing. Both filed a contention saying that the fund was insufficient, and MA would be payer of last resort. Yes, exemption granted to use DTF for spent fuel storage and soil remediation. See attachment.

3) **CAB/COB/CAP:** What community participation process, committee or panel was/is in place. Who appointed them? Were/are they effective?

Nuclear Decommissioning Citizens Advisory Panel was created by the Massachusetts Legislature.

<https://www.mass.gov/eea/ndcap/> Amendment filed this year to address some of the difficulties with the legislation in order to make it more effective. Principally the NDCAP requires: funding for administrative purposes and to hire experts; remove the two industry appointees-Holtec and CDI; change the administration appointees so that they are not voting members, to address issue they cannot vote absent approval of each agency's secretary; change voting to be a majority of those present; change over-all membership to include representatives from EPZ communities, appointed by town's BOS, not simply having citizen members from host community and representatives from unique geographic areas-Cape Cod in this case.

4) **Emergency Response:** What was the extent of emergency planning and response that occurred after the plant was closed and who paid for it?

The funding for radiological emergency planning is from the licensee- here negotiated by licensee with each EPZ town and to Massachusetts Emergency Management Agency. Funding is provided through April 2020- 10 months after reactor is defueled. This is based on the incorrect NRC theory that fuel 10 months out of reactor is unlikely to cause a pool fire and if one did occur it would be slow breaking allowing time for mitigation and moving population out in timely manner. Rationale presented in NRC draft decommissioning rule updates.

Currently towns are trying to get more monies. Plymouth, the host community, managed to get last week funds for an additional 2 years.

Submitted by Mary Lampert, Pilgrim Watch, 10/10/19