

Written Comments Received for the 9/21/2020 VT NDCAP Meeting

<Comments from Schuyler Gould>

Hello,

My name is Schuyler Gould, I am a citizen and homeowner in Brattleboro, Vermont. I have served as president of New England Coalition on Nuclear Pollution and am currently on the board of Citizens Awareness Network. Thank you for this opportunity to speak to you. This is going to take about four minutes. It's important.

This panel, in response to a proposal by its vice-chair, is currently considering whether or not it is appropriate, or even legal, for the Panel, "to take a position on a national decommissioning issue."

This expressed dilemma is a bit perplexing. What is the Panel's previous Advisory Opinion in support of Centralized Interim Storage if not a weighing in on a national decommissioning issue? Similarly, it has been proposed that this Panel draft letters in support of Yucca Mountain as a national HLNW repository. Perhaps this is a good idea, on national waste policy, but it is not one to be followed through on until all the issues are thoroughly explored. Another point in this regard, Vermont's granite deposits were originally considered an appropriate site for a national HLNW repository. Politics got in the way of that particular possibility at that particular time, but, in fact, until a final repository site has been settled on, Vermont will remain a candidate for such a site. Shouldn't this Panel be prepared to weigh in on such a prospect?

I spoke recently about all of this with Don Hudson, the former and again current Chair of the Maine Yankee Community Advisory Panel. You might remember him, he has spoken before this panel previously. He has also advised the NRC, at its request, on various decommissioning issues including national waste policy.

These are Don's exact words, he encouraged me to share them with you. "About the year 2000 we (the Panel) could see the path ahead of us and shifted to national issues." This was five years before completion of the active phase of Maine Yankee's decommissioning. And, critically, "We talk about waste policy all the time, . . . not as individuals but as the body designated to advise our Congressional representatives. That's our job."

Obviously this panel is not going to solve technical problems associated with HLNW, but it is almost uniquely situated to understand the complex issues surrounding it. Policy decisions affecting its final disposition--who will be responsible for it, where will lie the balance between cost and safety, on whose land will it be disposed of, how will it get there, who will profit from this multi-billion dollar undertaking, who will not--these decisions must be informed by a concerned, and educated, citizenry.

I can see Vermont Yankee from the top of a pine tree in my back yard. The panel needs to understand this is a deeply personal issue, not just to me and others living in the immediate vicinity of the plant, but to a much larger community.

Don't be hasty in your decision, but don't delay either. The national discussion on nuclear waste policy is heating up. We have just learned of a new bill presented by Senator Sanders and Representative Welch, the "Nuclear Plant Decommissioning Act of 2020," which promises to provide significant funding for Citizen Advisory Boards such as this one to explore these very issues, also economic development assistance as well as outright grants to communities hosting so-called "stranded wastes." But don't wait for its passage. This panel needs to prepare itself now. The new Congress will be considering and almost certainly voting on a revision to the 1982 Waste Policy Act governing all aspects of national waste policy. Its outcome will affect the health and safety, and, yes, the economic health, of our entire region for years to come.

We should all want to know what is happening with this waste and what we can do to bring about its safe disposition. It is only proper that this panel educate itself and then advise the Governor and the citizens of Vermont on national waste policy, there is nothing more germane to its "duties," as described in its charter, "To serve as a conduit for public information and education on and to encourage community involvement in matters related to the decommissioning of the VYNPS."

<Comments from Shaina Kasper>

Shaina Kasper
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September 21, 2020

To: NDCAP

Re: Ensuring the Vermont Yankee Site and Nuclear Waste is handled with safety, good science, and environmental justice in mind.

My name is Shaina Kasper and I'm the Vermont State Director with Community Action Works, formerly known as Toxics Action Center. I'm calling on NDCAP to ensure that the site and the nuclear waste is handled with safety, good science, and environmental justice in mind.

At Community Action Works, we believe that environmental threats are big, but the power of well-organized community groups is bigger. That's why we work side by side with everyday people to confront those who are polluting and harming the health of our communities. We partner with the people who are most impacted by environmental problems, who are often Black, Brown, Indigenous, communities of color and poor communities, training them with the know-how anyone would need to make change in their own backyard. Because when neighbors know how to make change, you can build the power to transform your world.

We have worked on nuclear waste for years, including facilitating the Safe Power Vermont Coalition, and giving Entergy a "Dirty Dozen" award in 2006. From this experience, we are calling on NDCAP to ensure that the site and the nuclear waste is handled with safety, good science, and environmental justice in mind.

1) We cannot deal with Vermont's environmental burden by pushing it onto already overburdened communities. Vermont is one of the few states without an Environmental Justice law on the books, a problem that Community Action Works and others are actively trying to remedy. The Environmental Protection Agency (the EPA) defines Environmental Justice as "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies." Pushing our waste onto a poor indigenous community across the country without their consent is a clear violation of Environmental Justice.

The communities proposed to take this high-level nuclear waste -- thousands of miles across the country -- is already a national sacrifice zone for radioactive contamination. This poor, indigenous community is on a state line meaning that the highly impacted community in the neighboring state will have no official say in the waste management process. This proposal does not have community support and so this process is unconsensual and undemocratic. Vermont should not support this project at all, much less add to the pollution burden on this community.

In addition to the environmental and health concerns of storing this waste in Texas, there is also significant concern about transporting this nuclear waste. The cars shipping this waste across the country are a mobile Chernobyl ready to happen. We cannot put this danger on the road. Instead, we have an obligation to keep our waste on-site in long-term consolidated interim storage.

2) We need safety to be paramount in any plan or strategy to deal with the long-lived waste problem that Vermont Yankee has created. Vermont Yankee has a long history of devastating environmental impacts including significant operational problems including misplaced radioactive fuel rods, a catastrophic failure in its electrical switchyard, a fire, cracks in the steam dryer, elevated levels of radiation at the boundary of the facility, dropped cask, a cooling tower collapse, spent fuel in a kiddie pool and more. There are over a million bounds of nuclear waste on the banks of the Connecticut River. An elementary school shares a parking lot with the facility. We have many serious safety, health, and environmental concerns.

We must take a smart and scientific risk-based approach for dealing with Vermont Yankee's waste. The current pad for dry casks does not have enough space for all the spent fuel which will have to be moved from the pool into new dry casks. Buildings on site go up to 50 feet below grade, tritium was found at 300 feet down, but per NRC rules, Entergy is not required to clean up below three feet. While Vermont Yankee wasn't designed to store spent nuclear fuel, we must update our site to best standards of consolidated interim storage in Vernon.

Meanwhile, we're in the midst of climate chaos. As we meet, the sky here in Vermont is filled with smoke from forest fires on the west coast. We've seen once-in-a-lifetime floods in Vermont multiple times in my thirty years here. We need to have the on-site storage that is as safe as possible for the coming floods and (un-)natural disasters to come.

3) We urgently need to dramatically alter our energy system to move to clean, local, renewable energy. We need to replace power generators like the old dangerous and polluting Vermont Yankee nuclear reactor with innovative, safe, and affordable solutions to make sure that we are never in this conundrum again.

The question of what to do with spent nuclear fuel has plagued the US since before the country's first commercial nuclear power plant was even running. In the 28 years since the Nuclear Waste Policy Act was passed, we still have no good solution for dealing with spent nuclear fuel. Meanwhile, here in Vermont and across the country, fracked gas pipelines are being expanded, coal plants continue to run, and many Vermonters get their electricity and heat from oil. The climate crisis requires urgent action. We must commit to 100% renewable energy, Environmental Justice for Black, Brown, Indigenous, people of color, and poor people, and incentivize green infrastructure while protecting vulnerable communities.

Because of these and other concerns, we are calling on NDCAP to ensure that the site and the nuclear waste is handled with safety, good science, and environmental justice in mind.

Sincerely,

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