

New England Coalition on Nuclear Pollution Intervention in VPUC Docket 8880

Comments to Vermont NDCAP October 26, 2017

Clay Turnbull

Why intervene?

How could the proposal be **improved**?

Why intervene?

NEC is concerned not only with the timing of decommissioning, but with the **quality** of the decommissioning.

We can strive to return the land to “as good as before” or we could leave it as an orphaned industrial site with residual radiation higher than necessary.

Vermont Yankee should follow the examples of Maine Yankee, Connecticut Yankee and Yankee Rowe in Massachusetts, and adopt standards for site residual radiation of 10 mR all pathways and 4 mR for water.

You could think of it as the

“New England Standard” and/or the
“10/4 Standard”

The current proposal for Vermont Yankee is one and a half times dirtier than the levels at other New England decommissioned reactor sites.

Vermonters deserve a site which is at least as clean as other New England sites.

After site restoration has been completed, the site should be maintained as a nature preserve, with no industrial, commercial or residential use.

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It is important to remember that mostly because of ISFSI security considerations no decommissioned commercial nuclear power station has been repurposed for industrial or commercial use **while both Maine Yankee and Connecticut Yankee sites boast nature preserves and open land.**



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NorthStar should be required to have a performance bond of at least \$200 million to guarantee complete radiological and non-radiological decommission.

If NorthStar doesn't have the collateral sufficient to support that, then it likely doesn't have assets sufficient to support raising money to meet and large surprise costs either.

Surprise costs can and do occur at nuclear power station decommissionings.

At Connecticut Yankee, when well into decommissioning, massive contamination was found resulting in a surprise \$400 million increase in decommissioning costs.

Similarly at Maine Yankee deep pockets of radioactive contamination of surprising intensity were found well after decommissioning had begun.

There is a prohibition against using rubblization at the site which must be enforced.

- The site is a Native American cultural site with profound ceremonial and ancestral implications.
- The alkaline chemical reaction of concrete with (acid) rainwater, groundwater, and wet soil is greatly enhanced by rubblization.
- There will inevitably be negative radiological implications.

If over a million cubic feet of demolition debris is going to be buried on site, NorthStar should be required to obtain a permit governing solid waste disposal.



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