

To: Entergy Vermont Yankee, VT Dept. of Public Service, NDCAP
From: Arnie Gundersen & Leslie Sullivan Sachs, Fairewinds Environmental Education
Date: December 18, 2014
Re: Comments on PSDAR

I am Leslie Sullivan Sachs, from Brattleboro. I am speaking tonight as a representative of Fairewinds Energy Education. Arnie Gundersen, chief Engineer for Fairewinds, will make a formal report on the PSDAR in February. Tonight we briefly comment on 4 aspects of the PSDAR: financial transparency, spent fuel management, contamination and liability.

1. If Entergy is going to walk the talk of transparency, the first thing it can do is be open about what financial options the state has and what we as citizens have. We agree with the state that there is nothing new in the PSDAR compared to the 2012 Decommissioning Report. Nothing is site specific. Fairewinds is working on an interactive financial analysis for our upcoming report that will provide more useful analysis than the old data in this PSDAR.

The financial growth in the later years of SAFSTOR is so small it makes no financial sense to wait. The longer we wait, the higher the risk of contamination, the higher the cost to clean up the Vermont Yankee site.

2. Were it not for the spent fuel storage, VT Yankee could be completely decommissioned in ten years. Spent fuel management monies should not be taken out of the decommissioning trust fund. The MOU agreement gave ratepayers half of any excess after decommissioning. Entergy plans to ask the NRC to tap our decommissioning fund to pay for spent fuel storage, and must ask for an exemption to do so. If the NRC grants an exemption to draw down \$223 million from the trust fund, Entergy is effectively getting an interest free loan from Vermont and its ratepayers who built the fund. Does the state plan to be a party and to appeal the NRC exemption request?

For worker radiation safety, waiting five to seven years to begin decommissioning is effective. Entergy claims it is very concerned about worker radiation exposure, and wants to wait longer for the radiation to decay. If Entergy had really been concerned about exposure to its workers, re-fueling outages would have been at least 3 months long, rather than only 22 days. When Entergy was counting on profits, worker exposure was irrelevant. Now when no money is being generated by VY's operation, Entergy pretends it is putting worker exposure first, rather than their desire not to use their own funds to clean up quickly.

Entergy had the opportunity to buy earth bermed canisters. To save money, Entergy did a "fleet buy" of canisters that are designed to sit aboveground. When Vermont Yankee Upgraded its power, the fuel enrichment increased from 3-4% enriched fuel up to 5+%, higher enrichment fuel. In both cases, Entergy made took more profit on the fleet buy of the dry casks and use of the more enriched fuel, but Vermonters are the ones who will be and have been impacted by the higher radiation risks. This high burn-up fuel (HBF) presents serious storage problems that were not analyzed when Entergy did bought the cheapest casks and used a higher radioactive

fuel.

The canisters Entergy has are not strong enough for HBF fuel rods to ride out an accident. If they leak, or if the DOE doesn't pick them up in 30 years, there is no way to move spent fuel rods into new canisters without using a fuel pool. We would love to knock that building down but it may have to stay. What is Entergy's Plan B if containers leak and there is no fuel pool?

We never supported putting the spent fuel pad by the River. If there is a flood, there will be mud, which could plug up the holes in the canisters that allow cooling air to flow. A new pad should be built further from the Connecticut River and the flood plain, perhaps at the switchyards.

3. We need to clean up what we already know is there, and we need to do it now. When Arnie was on the Public Oversight Panel, radioactivity was found under the foundation of the AOG. Why isn't the AOG building being dismantled as soon as possible? If we wait, decontamination will spread into the water table and be more expensive to clean up. Trap the contaminated underground material and store it aboveground for now.

4. There is more cesium on site than all the bombs that were ever detonated. If the fuel pool is punctured while they are moving radioactive fuel, the game is over. We need an emergency plan – not with as many people as when the plant was operating, but something that still recognizes the severity of a radiation release from an accident. We believe it is worth depleting the trust fund for \$2 million a year for emergency planning and preparedness. Such a small fee to create jobs for Vermonters, protecting Vermonters.

Entergy simply does not know where all the leaks from underground or buried pipes are. A building deemed safe to dig three feet below surface could have contamination starting 3 feet 1 inch below. Or five feet. A fund should be created now for what Entergy does not find, but future potential buyers inherit, so the state does is not left with this liability.

This time is fraught with danger – when a reactor is running at less than full power. We are all counting down the days, but it is not inconsequential. We will breathe easier when the aged Vermont Yankee plant is fully shut down.

Arnie Gundersen, chief Engineer for Fairewinds, holds a nuclear safety patent, was a licensed reactor operator, and is a former nuclear industry senior vice president. During his 40+ year career in the nuclear power industry, Arnie also managed and coordinated projects at 70- nuclear power plants in the US. **Leslie Sullivan Sachs** is a researcher, blogger and social media producer for Fairewinds, and Project Manager for the Safe and Green Campaign. Before moving to Brattleboro in 2010, she was on the staff of Vermont Law School, including a ten year stint as Assistant Director of its Environmental Law Center. www.fairewinds.org