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March 29, 2019

Commissioner Vermont Department of Public Service  
112 State Street-Drawer 20  
Montpelier, VT 05620-2601  
Hand Delivered and e-mailed to [June.Tierney@vermont.gov](mailto:June.Tierney@vermont.gov)

Director for Public Advocacy  
Vermont Department of Public Service  
112 State Street - Drawer 20  
Montpelier, VT 05620  
Sent via e-mail to [Allison.Wannop@vermont.gov](mailto:Allison.Wannop@vermont.gov)  
Sent via e-mail to [James.Porter@vermont.gov](mailto:James.Porter@vermont.gov)

Re: Report Pursuant to MOU Section 2(h)

Dear Commissioner Tierney:

Enclosed please find NorthStar Vermont Yankee, LLC's report submitted in accordance with Section 2(h) of the Memorandum of Understanding for Docket No. 8880 dated March 2, 2018 ("MOU"). Please note that NorthStar has copied the relevant MOU provisions and provides its response in underline.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gregory G. DiCarlo", written over a light blue horizontal line.

Gregory G. DiCarlo  
Vice President and General Counsel

## **MOU Section 2(h)**

On or before March 31 of each calendar year following the close of the Proposed Transaction, NorthStar shall provide to DPS, ANR, VDH, and AGO an annual public certification that includes the following:

- (1) A detailed description of all work completed as of that date pursuant to corrective action plans approved by ANR pursuant to Subchapter 5 of the IRule.

There are no corrective action plans approved by ANR to date.

- (2) A detailed description and schedule of remaining corrective actions and site restoration work.

NorthStar has submitted a site investigation work plan to ANR for review pursuant to MOU Section 5(d)(1). On February 12, 2019, NorthStar provided an introduction of our team to ANR and an overview of our proposed approach for investigation of the VY site under the I-Rule and in compliance with the MOU. On that date, NorthStar also provided hard copies of the MOU-required work plans, with the exception of the Groundwater Monitoring plan. ANR requested that we organize the documents into one complete work plan, and on February 19, 2019, NorthStar formally submitted the following documents to ANR electronically:

1. Limited Non-Radiological Site Sampling Plan, Rev F
2. Appendix A: Below-Grade Structure Survey Work Plan
3. Appendix B: Borrow Materials Import Plan
4. Appendix C: Groundwater Monitoring Plan
5. Appendix D: Concrete Reuse Plan
6. Quality Assurance Project Plan, Rev E

On February 28, 2019, NorthStar met with ANR and its contractor, ATC, to review the details of each plan. A site tour with ANR was conducted on March 15, 2019.

The enclosed flow chart demonstrates the process NorthStar is following to close the site and the enclosed schedule provides NorthStar's near term efforts to satisfy the process. Attachment 2(h)(2)-1 (Flow Chart) and Attachment 2(h)(2)-2 (Schedule).

- (3) The amount of funds available for site restoration as of the end of the calendar year preceding the date of the report.

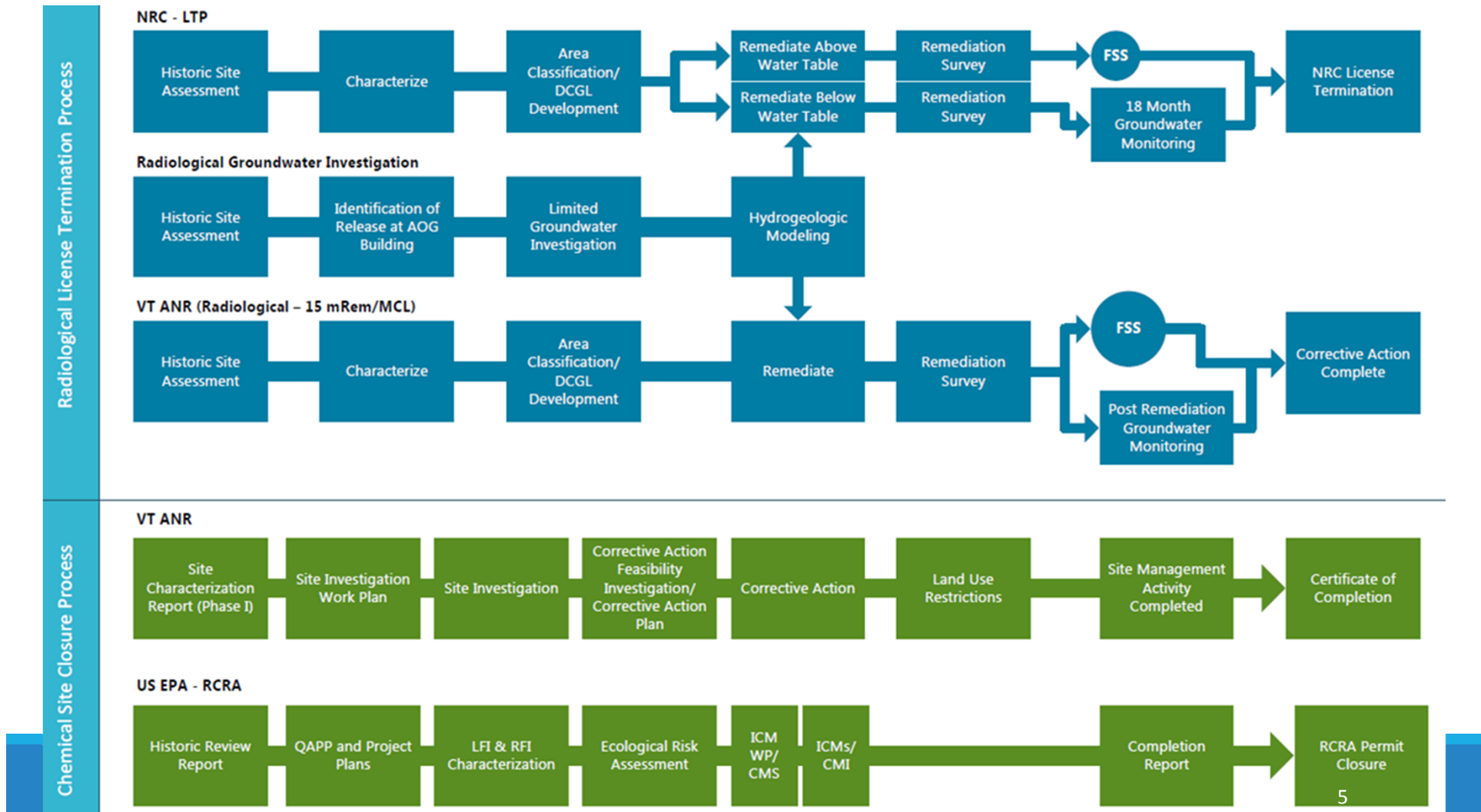
The balance of the site restoration trust as of January 11, 2019 was \$60,012,857.

- (4) The amount of funds estimated to be required to complete site restoration.

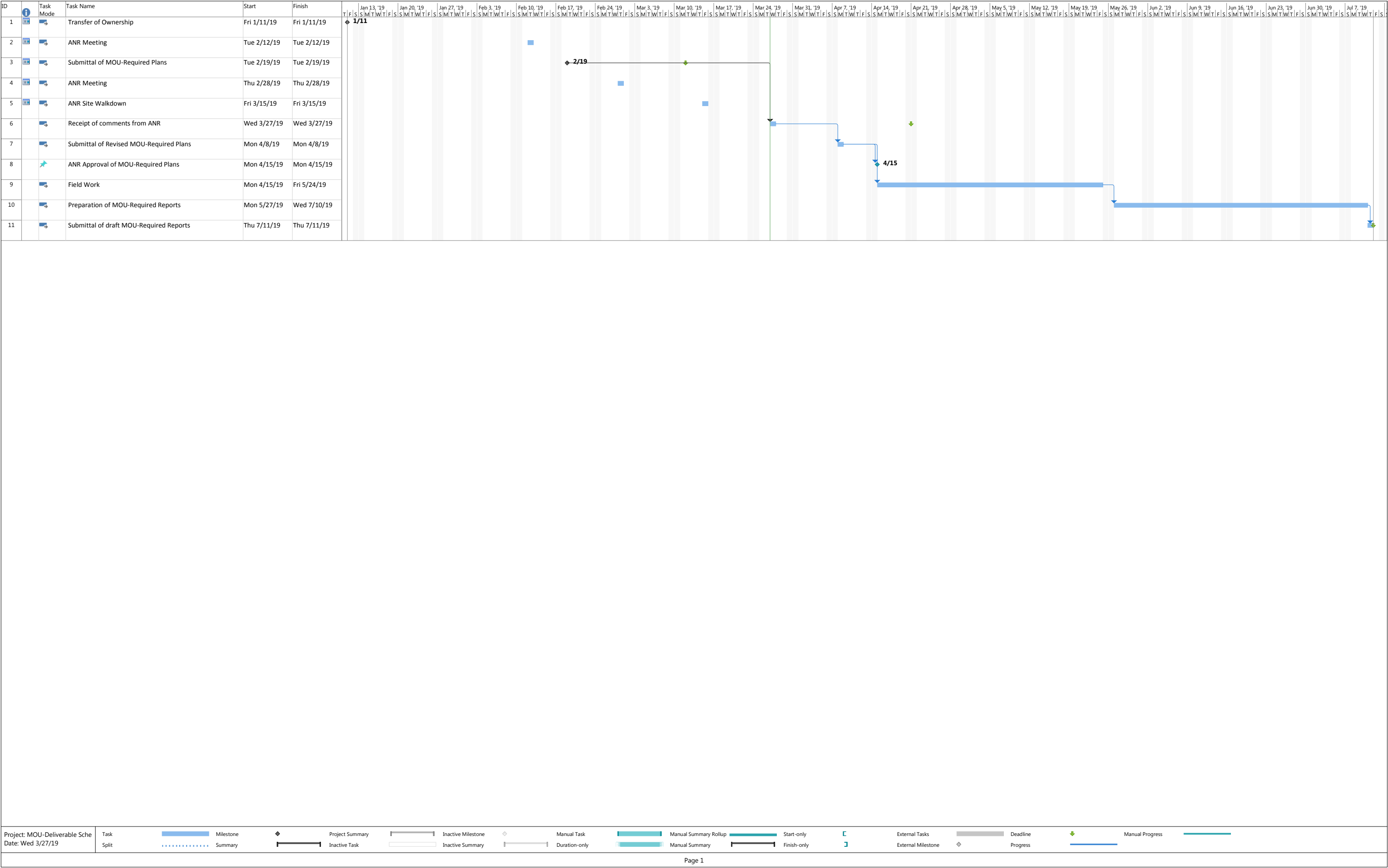
The estimated amount of funds required for site restoration work remains at \$25 million.



# Programs Overview/Overlap



Attachment 2(h)(2)-2



## CERTIFICATE OF SERVICE

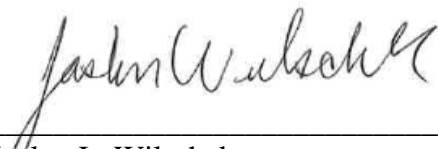
On behalf of NorthStar Vermont Yankee, LLC, I hereby certify that I have this day served NorthStar's report via e-mail to the following entities pursuant to the Docket 8880 Memorandum of Understand Sections 2(h) and 29):

June Tierney Commissioner Vermont Dept. of Public Service June.tierney@vermont.gov	James Porter Director of Public Advocacy Vermont Dept. of Public Service <a href="mailto:james.porter@vermont.gov">james.porter@vermont.gov</a> Allison.wannop@vermont.gov
Julie Moore Secretary Agency of Natural Resources <a href="mailto:ANR.notice@vermont.gov">ANR.notice@vermont.gov</a> <a href="mailto:jordan.gonda@vermont.gov">jordan.gonda@vermont.gov</a>	Matt Chapman General Counsel Vermont Agency of Natural Resources Matt.chapman@vermont.gov
The Honorable T.J. Donovan Vermont Attorney General <a href="mailto:Thomas.Donovan@vermont.gov">Thomas.Donovan@vermont.gov</a> <a href="mailto:justin.kolber@vermont.gov">justin.kolber@vermont.gov</a> joshua.diamond@vermont.gov	Mark Levine, MD Commissioner Vermont Department of Health <a href="mailto:Mark.levine@vermont.gov">Mark.levine@vermont.gov</a>
David Englander Senior Policy and Legal Advisor Vermont Department of Health David.englander@vermont.gov	

DATED at Montpelier, Vermont, this 29th day of March 2019.

NORTHSTAR VERMONT YANKEE, LLC

By: \_\_\_\_\_

  
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