



NorthStar Group Services, Inc.

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Gregory G. DiCarlo

Vice President and General Counsel

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March 31, 2021

Commissioner Vermont Department of Public
Service 112 State Street-Drawer 20

Montpelier, VT 05620-2601

Sent via e-mail to 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 Eric.Guzman@vermont.gov

Sent via e-mail to 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,

Gregory G. DiCarlo

Vice President and General Counsel

Attachments

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.

Answer: There are three corrective action plans approved by ANR to date, with anticipation of two additional corrective action plans to be submitted in 2021. .

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

As noted on the 2018 Annual Report for Site Restoration and Characterization work following the formal sale closing, 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

Following a February 28, 2019 meeting between VT ANR and its contractor, ATC, to review the details of the restoration and characterization plans prepared in 2018, and a follow-on site tour conducted on March 15, 2019, VT ANR provided comments and approved concurrent activities for NorthStar to finalize the plans and also execute the field activities in anticipation of comments and requirements in order to get to a Final Site report that would result in closure of Areas of Concern or Corrective Actions as necessary.

Below are the work tasks and noted documents that were completed that resulted on the submission of the noted documents above being able to be submitted to VT ANR:

- Updated Draft Characterization Phase 1 Report
- Voluntary Removal Plan, Rev 0
- Voluntary Removal Plan, Rev 1
- Legal Support/Permit Support
- Building Material Characterization WP, Rev 0
- Building Material Characterization WP, Rev 1
- Building Material Characterization WP, Rev 2
- Final Draft Characterization Phase 1 Report
- Phase 2 Sampling Plan Data Quality Objectives (DQOs)
- Phase 2 Sampling Plan Rough Draft

- Phase 2 Sampling Plan First Draft
- Phase 2 Waste Area Group (WAG) Identification Plan Outline
- Phase 2 WAG Identification Plan Rough Draft
- Phase 2 WAG Identification Plan First Draft
- Phase 2 Update of Voluntary Removal Plan (D2) - Initial
- Phase 2 Update of Voluntary Removal Plan (D2) -Final
- Phase 3 Draft Remedial Action Scope and Schedule
- Phase 3 Provide Rough Draft RAWP
- Phase 3 Interim Draft RAWP - D1
- Phase 3 Final Draft RAWP - D2
- Phase 3 Review Data from Sampling for Waste Profiles
- Limited Characterization Sampling: Preparation
- Limited Characterization Sampling: Sampling Labor
- Limited Characterization Sampling: Analytical
- Limited Characterization Sampling: Data Report
- Site Investigation - Site Sampling WP, Rev D
- Site Investigation - Corrective Action Plans (drafts)

Upon receiving comments from VT ANR on the Work Plans, NorthStar conducted supplemental field sampling to generate an updated Site Investigation Report that would depict non-radiological conditions at Vermont Yankee. These Site Investigation tasks included the following activities;

- Site Investigation – Vermont ANR Meetings
- Site Investigation Data Gap Report and Investigation
- Site Investigation - Site Investigation Schedule generation
- Site Investigation - Training
- Site Investigation - Site Investigation Field Sampling for Supplemental Data Gaps
- Site Investigation - SI Report with Validation, Rev 0 and 1
- Site Investigation - Non-Radiological Groundwater Sampling WP (1Q 2019), Rev A and B
- Site Investigation - Qtrly Non-Radiological Sampling & Reporting (2Q, 3Q, and 4Q 2019)
- Site Investigation - Qtrly Non-Radiological Sampling & Reporting (1Q 2020)
- Annual Groundwater Monitoring Report
- Site Investigation - Non-Radiological Groundwater Sampling WP (1Q 2021), Rev A and B
- Site Investigation - Qtrly Non-Radiological Sampling & Reporting (2Q, 3Q, and 4Q 2020)
- Additional VT ANR Meetings (Restoration and Characterization)

- Additional Site Investigation Data Collection for the updated Site Investigation Report
- Vermont ANR and Subcontractor Coordination during Supplemental Data Field Sampling
- Additional Vermont ANR Meetings (Restoration and Characterization reporting)
- Updated Site Investigation Report (draft 4Q 2019)
- Draft Risk Evaluation Report
- Draft Post Demolition Survey and Sampling Plan

NorthStar conducted a Baseline Radiological Surface Scan Survey of Lands during 2019 of the facility property with the results producing a high-quality, spatially-robust, and accurately geo-referenced spectral gamma scan data set that is representative of the radiological conditions in surface and near-surface soils at the Vermont Yankee site.

The tasks and work items noted above supported generation of data that was incorporated into the final Updated Site Investigation Report that was submitted to Vermont ANR on January 31, 2020. Following this submission will be the resulting Corrective Action Plans for areas of concern that will be addressed in 2021 or 2022, pending approval of an Individual Construction Permit and approval of the Risk Evaluation Report. Following is the updated Table of Areas of Concerns:

Area of Concern	Investigation of Accessible Areas Complete?	Remediation Needed?	Remaining Data Gaps	Crosswalk to Decommissioning Work Breakdown Structure (WBS)
AOC 1 - 345 kV Switchyard	Yes	No	VELCO has a 99-year lease: soils within the yard will require characterization when lease expires.	
AOC 2 - 115 kV Switchyard	Yes	No	VELCO has a 99-year lease: soils within the yard will require characterization when lease expires.	
AOC 3 - South Warehouse	Yes	Yes	Limited shallow soil removal required, followed by confirmatory soil sampling	
AOC 4 - Former North Warehouse	Yes	No	N/A	
AOC 5 - Turbine Building	Yes	No	Soils under shallow foundations to be evaluated after removal.	1.04.11 Areas A6 - Chemistry Lab Drain Line 1.04.27 Area C100 - Turbine Building Clean Up

Area of Concern	Investigation of Accessible Areas Complete?	Remediation Needed?	Remaining Data Gaps	Crosswalk to Decommissioning Work Breakdown Structure (WBS)
				Sump
AOC 6 - Rad Waste Storage Building	Yes	No	Soils to be evaluated following slab removal	1.04.06 Area A5 - Northeast Side of Radwaste Building 1.04.17 Areas C86 & 87 - Sandblast Debris East of Radwaste Building
AOC 7 - Fuel Storage Tanks	Yes	Yes	Former UST SW of Turbine Building; impacted soil along piping associated with the 75,000-gal FOST; and small stained area SW of the Shipping & Receiving Building. For each area, fuel oil/diesel impacted (PAH) media to be excavated & disposed off-site. Confirmatory sampling to follow.	
AOC 8 - Transformers	Yes	Yes	Area directly under ABB/Main transformer. To be coordinated with AOC 5 remediation of former UST location. A small area of shallow soil adjacent to the East Cooling Tower	

Area of Concern	Investigation of Accessible Areas Complete?	Remediation Needed?	Remaining Data Gaps	Crosswalk to Decommissioning Work Breakdown Structure (WBS)
			Transformer pad will also require removal and off-site disposal followed by confirmatory soil sampling.	
AOC 9 Intake and Discharge Systems	Yes	No	N/A	
AOC 10 - Parking Lots	Yes	No	To be evaluated after pavement is removed	
AOC 11 - Haz Materials Storage Areas	Yes	No	Soils to be evaluated following warehouse slab and Haz Stor shed removal.	
AOC 12 Former Edson's Gulf Station	Yes	No	Pending Risk Evaluation approval	
AOC 13 - Septic Systems	Yes	Yes	PAH impacted areas and stockpiles (North Application Field).	1.04.10 Areas B1 - Septic System Sludge 1.04.13 Areas B2 - Excavated Material Pile from PA Mods 1.04.14 Areas B3 - Septic System Tanks 1.04.15 Areas B5 - North 40 of Owner Controlled Area
AOC 14 - Stormwater Outfalls	Yes	No	Pending Risk Evaluation approval.	1.04.03 Area A3 - North Storm Drain Outfall River Bank

Area of Concern	Investigation of Accessible Areas Complete?	Remediation Needed?	Remaining Data Gaps	Crosswalk to Decommissioning Work Breakdown Structure (WBS)
				1.04.04 Area A4 - Manhole 12 1.04.05 Area A4 - South Strom Drain System
AOC 15 - Cooling Tower Area	Yes	Yes	Soil piles removed, remaining areas pending Risk Evaluation approval.	1.04.07 Area B2 - Area Near West Cooling Tower 1.04.12 Areas B1 - Deep Basin Colling Tower Silt 1.04.16 Areas B6 - Burn Area
AOC 16 - Railroad Lines	Yes	Yes	Pesticide and PAH impacts to shallow soils, and potential limited soil removal to meet Residential Criteria. Currently the AOC meets Industrial/Commercial criteria.	
AOC 17 - Sitewide Groundwater	Yes	No	Limited MNA, no active GW treatment needed	

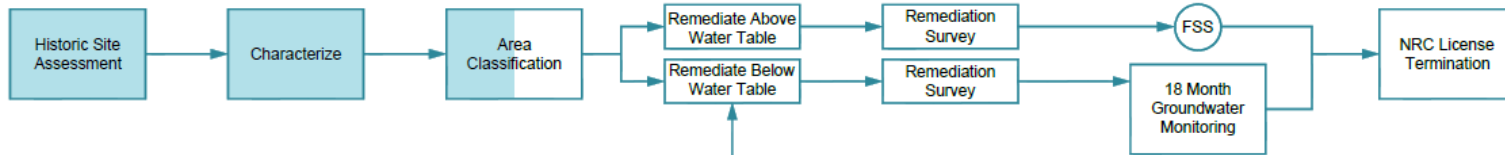
An indication of the progress of Site Restoration and Characterization activities in relation to the Vermont ANR (I-Rule) for the chemical site closure process is depicted on the following figure:

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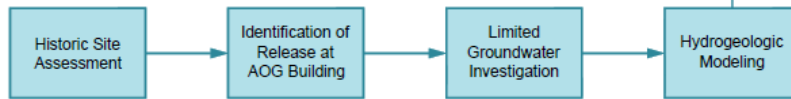
Vermont Yankee Regulatory Matrix

Radiological License Termination Process

NRC - License Termination (25 mRem/yr and MCLs)

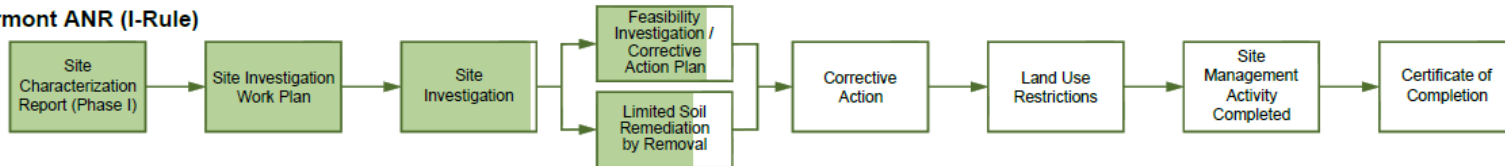


Radiological Groundwater Investigation



Chemical Site Closure Process

Vermont ANR (I-Rule)



LEGEND

- WORK COMPLETED IN SUPPORT OF LICENCE TERMINATION
- WORK COMPLETED IN SUPPORT OF SITE CLOSURE FOR NONRADIOLOGICAL CONSTITUENTS

ABBREVIATIONS

- | | | | |
|--------|---|--------|---|
| ANR | Agency of Natural Resources | LTP | License Termination Plan |
| AOG | Augmented Off-Gas Building | MCL | Maximum Contaminant Level |
| CMI | Corrective Measures Implementation | NRC | Nuclear Regulatory Commission |
| CMS | Correct Measures Study | QAPP | Quality Assurance Project Plan |
| FSS | Final Status Survey | RCRA | Resource Conservation and Recovery Act |
| ICM | Interim Corrective Measures | RFI | RCRA Facility Investigation |
| I-Rule | The Investigation and Remediation of Contaminated Properties Rule, effective July 6, 2019 | US EPA | United States Environmental Protection Agency |
| LFI | Limited Field Investigation | WP | Work Plan |



Summary support to the project in 2020 also included the following characterization activities and tasks;

- Final Updated Site Investigation Report
- NDCAP Support on progress of Characterization and Site Restoration plans
- General Environmental and Permit Support
 - Potable Water Construction and Modification Permits
 - Individual Construction Permit Application
- Building Characterization Support
 - Building Characterization – Vermont ANR Meeting
 - Building Characterization - Revised Building Characterization WP
 - Building Characterization - Building Characterization Field Sampling
 - Building Characterization - Update Building Materials Sampling Report
 - Building Characterization - Sub-grade Structures WP, Rev A and B
 - Building Characterization - Building Characterization Reports including Sub-grade Structures (per Building), Rev A and B
 - Building Characterization - Building Materials Data Gap WP, Rev A and B
 - Building Characterization Materials - Concrete Management & Disposal Plan
 - Additional Building Characterization Sampling and Vermont ANR Certification
 - Cable Characterization (PCBs and ACM)
- Various Agency and Subcontractor Coordination
- Environmental and Waste Characterization Support for Non-Radiological aspects
- Dewatering
 - Discharge Permit Amendment Request and Waste Disposal Support
 - Dewatering Support, Groundwater Modeling and Dewatering Well Installation, Design and ongoing Support
- Residual Permit and Septic Field Sampling Requirements
- Public Potable Water Supply Permit application and issuance.

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

\$18,135 million will be required to complete the site restoration.

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 James.porter@vermont.gov Eric.guzman@vermont.gov
Julie Moore Secretary Agency of Natural Resources ANR.notice@vermont.gov jordan.gonda@vermont.gov	Matt Chapman General Counsel Vermont Agency of Natural Resources Matt.chapman@vermont.gov
The Honorable T.J. Donovan Vermont Attorney General Thomas.Donovan@vermont.gov Justin.kolber@vermont.gov Joshua.diamond@vermont.gov	Mark Levine, MD Commissioner Vermont Department of Health Mark.levine@vermont.gov
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DATED at Trumbull, Connecticut, this 31st day of March 2021.

NORTHSTAR VERMONT YANKEE, LLC

By: _____


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