

Kate O'Connor  
Remarks to NRC – March 15, 2016

Thank you for the opportunity to take part in this meeting. As was noted, I am chair of the Vermont Nuclear Decommissioning Citizens Advisory Panel.

We are pleased that the Nuclear Regulatory Commission has begun the process of developing rules for the decommissioning of nuclear power reactors and appreciate the opportunity to comment.

By way of background the Vermont Nuclear Decommissioning Citizens Advisory Panel is a 19 member panel established by the Vermont legislature in 2014 in response to Entergy's announcement that it would close the Vermont Yankee Nuclear Power Station in Vernon, Vt. The panel includes representatives from Vermont state government, Entergy, the states of NH and MA, the host town, Vernon, VT and six citizen members of which I am one having been appointed by the governor of Vermont.

You have received written comments from the six citizen members and will receive comments separately from the State of Vermont and other members of the panel.

The citizen members' comments, which I will speak to today reflect the public's desire to play a constructive role in the decommissioning process and their desire to have the states and host communities have a role in the process as well. After all, it is the communities that host nuclear power plants that face the long-term health, safety, environmental, and economic challenges when a plant shuts.

As I said, you have received comments from the citizen members of the panel that touch upon the issues that directly impact the public. Today, I will focus on one of those: public participation.

In the Advance Notice of Proposed Rulemaking, you ask if community engagement panels should be required by the NRC. The 19 members of the Vermont panel come from different perspectives and have had different experiences, but I think any panel member you ask will say that the Vermont panel has played an essential role in providing a forum for public engagement in the decommissioning of Vermont Yankee. The panel has allowed for the dissemination of information from all parties involved; allowed the public to express their views and concerns; provided a forum for open and transparent discussion; and has established a working relationship between parties who might not otherwise have worked together.

While we agree on the importance of a panel, we might disagree on how it should be formed, so I will speak from the perspective of the citizen members.

- We would recommend a community advisory panel to all communities facing a plant decommissioning. However, we do not believe community engagement panels should be mandated by the NRC since such panels would be formed by the licensee. Instead, the NRC should recommend that advisory panels be formed by the states, using past and present state panels as models. The NRC should require the licensee to have one or more representatives on the advisory panel and provide the financial resources necessary for the panel to run effectively. Entergy's involvement on the Vermont panel has been important to our success.
- The Vermont panel was established as an independent body by the Vermont legislature, not the licensee. This has worked well for us and we believe the host state and local community, in consultation with the licensee, should have the flexibility to establish a panel that will best serve their needs.
- I want to stress that a community advisory panel should supplement, not take the place of the NRC's obligation to seek public comment or engage with the public through meetings, hearings or other means.

It is important to recognize that the public's goal is to see a safe decommissioning that will lead to license termination and ultimately reuse of the site.

I want to thank you again for the opportunity to be here today. As the rulemaking moves forward I urge you to provide opportunities for host states and communities to be actively and substantively engaged in the process. I hope this will include public hearings in the impacted communities. The Vermont Nuclear Decommissioning Citizens Advisory Panel is ready and willing to help the NRC facilitate constructive public engagement in any way we can.