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December 17, 2019

June E. Tierney
Commissioner
Department of Public Service
112 State Street
Montpelier, VT 05620-2601

SUBJECT: EXECUTIVE SUMMARY ON DECOMMISSIONING ENGAGEMENT SURVEY

RECEIVED PSD

Dear Ms. Tierney,

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On August 6, 2019, 56 stakeholders were invited, via email, to participate in interviews to solicit their input on the NorthStar Vermont Yankee decommissioning for engagement design. Those invited were recommended from several sources including NEC, NorthStar VY plant management personnel, several representatives from the Town of Vernon, and NDCAP panel members.

Of those 56 invitations, 30 stakeholders were interviewed between August 6, 2019 and September 4, 2019. From those thirty stakeholder interviews, opinions and input were gathered regarding the effectiveness and design of NorthStar's decommissioning engagement program. Stakeholders were supportive of NorthStar's efforts in this regard and inputs were candid, constructive and comprehensive.

The majority of interviews were conducted via telephone, although a number were conducted face-to-face. Interview durations ranged from 20 to 75 minutes with the average duration being approximately 35 minutes

Transparency was viewed as the most important requirement for successful engagement. Stakeholders mentioned the trust deficit that NorthStar has inherited at the site. To that end, a transparent engagement effort will go a long way towards easing that deficit and building credibility.

In general, NorthStar was given good marks for its engagement efforts "so far." Scott State, Greg Di Carlo and Corey Daniels were mentioned as having high credibility.

With respect to topics of engagement, stakeholders expressed interest in hearing regular updates regarding:

- Physical progress
- Progress against schedule
- DTF expenditures (actual vs. planned)
- Waste transportation routes and disposal locations
- Upcoming work

Stakeholders also expressed a strong desire for NorthStar's engagement program to be nimble and timely. More specifically, stakeholders want to hear, from NorthStar, when there is a notable issue or problem. They do not want to learn about issues or problems third-hand or after the fact.

Most stakeholders viewed the functioning of the NDCAP as satisfactory for the engagement process and that its focus should remain primarily on environmental and radiological matters. Several stakeholders recognized the shift toward this as the primary mission (of NDCAP) now that decommissioning is underway.

Several interviewees recognized potential for duplication of effort with engagement as outlined in the MOU and the current role of the NDCAP. The consensus warning that it should be one and the same, for efficiency and to help avoid “mission creep” for the NDCAP.

Most stakeholders viewed a quality website as a necessity. Such a website would be regularly updated with decommissioning project information, report on past events, and foreshadow future efforts. Stakeholders did not expect a “fancy” website and urged NorthStar not to sacrifice substance for style. Further to that point, usability is a central requirement. The current website falls short of this objective.

In addition to an informative and usable website, several stakeholders relayed that the recent news articles from various local media sources as informative and welcome. Regarding media and messaging on some consistent frequency, it was also suggested that NorthStar try to “humanize” the project story to help make it “relatable to the larger populace”.

Many of the stakeholders from across the spectrum recognized the Town of Vernon as “primarily affected” by the closure of Vermont Yankee. Several stakeholders offered their views on the Town. Descriptors such as “isolated”, “in-transition”, and “slowly coming to grips” were used. In parallel, the Town itself views Vernon as NorthStar’s primary stakeholder in the decommissioning process.

It was generally acknowledged that helping Vernon “get back on its feet” should somehow be a component of the overall decommissioning project. This was not viewed as an expectation for a direct handout to the town, but more of an opportunity for strategic investment of NorthStar’s resources to help “take care” of Vernon when and wherever possible as a prudent business practice. Similarly, it was recommended by several interviewees that NorthStar remain open minded, and continually explore where they can collaborate with other stakeholders on projects or matters of mutual interest that do not materially impede NorthStar’s business obligations.

Some more specific comments included:

- Concern regarding local air quality and potential human health impacts to the occupants of the elementary school during decommissioning. In this regard, additional monitoring and possibly independent testing was offered as a potential solution.
- Maintaining strong alignment with ANR for the duration of the project to ensure that the knowledge base remains stable and that clear and complete documentation occurs to support timely closeout at the completion of the project.
- The potential role of independent experts was raised. Their use, when determined appropriate, to help ensure transparency, credibility and accuracy of reporting was recommended.

KEY TAKEAWAYS:

TRANSPARENCY IS EXPECTED

Regardless of the oversight roles of the State, the NRC, and other regulatory agencies, NorthStar bears the primary responsibility to effectively engage with interested stakeholders throughout the decommissioning process. To that end, an engagement campaign that is as open and transparent as reasonably practical is expected by all stakeholders.

DECOMMISSIONING ENGAGEMENT IS ABOUT MORE THAN THE PHYSICAL WORK OF RESTORING VY SITE

Completing the Vermont Yankee decommissioning includes more than just terminating the NRC license. Many stakeholders spoke to the importance of helping Vernon (and the region) rebound from the losses associated with plant closure. 100% of the stakeholders interviewed expressed a shared interest with NorthStar; namely to see the VY site decommissioned and safely returned to beneficial use as soon as practical. This sentiment is recognized as a significant opportunity for NorthStar with respect to stakeholder engagement.

Accurate and timely communication of info through multiple media platforms will improve engagement.

NOT ALL STAKEHOLDERS ARE CREATED EQUALLY. AT LEAST FIVE DISTINCT KEY STAKEHOLDER GROUPS EMERGED FROM THIS INTAKE, INCLUDING:

- The Town of Vernon (Select Board and Planning Commission)
- The NDCAP
- NEC
- The general public
- ANR and the State

Each of these entities may require some degree of “personalized” effort by NorthStar to ensure effective engagement is sustained. It is recognized there are likely other stakeholder groups as well.

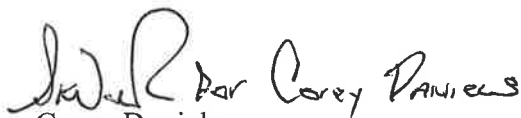
NDCAP PROCESS AND MEETINGS ADEQUATELY ADDRESS ENGAGEMENT

Most stakeholders view the functioning of the NDCAP as satisfactory for the engagement process. With the provisions and controls arranged through VT Docket 8880, (MOU), there is somewhat less overall concern for accountability by NorthStar as the decommissioning entity and owner. To date NorthStar has effectively engaged with interested stakeholders throughout the decommissioning process.

Overall, the stakeholders from every facet interviewed agreed that if NorthStar were to summarize their engagement program into a simple Work Plan and socialize it (with such key stakeholders as listed above) to:

- (i) demonstrate that NorthStar has listened to their input; and
- (ii) reaffirm support for key initiatives; it will improve engagement and help create a platform for an iterative and sustainable process.

Respectfully,



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Vermont Yankee Nuclear Power Station