



THE COMMONWEALTH OF MASSACHUSETTS  
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January 26, 2022

**VIA ELECTRONIC MAIL**

William F. Gill, Vice President and  
Corporate Counsel  
1 Holtec Blvd.  
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(W.Gill@holtec.com)

**Subj: Agency Comments on Amended Initial Environmental Site Assessment Work Plan**

Dear Mr. Gill:

We are writing to convey the comments of the Massachusetts Departments of Environmental Protection and Public Health (Agencies) on Holtec Decommissioning International's (Holtec) Amended Initial Environmental Site Assessment Work Plan (Amended Work Plan). As you will see in the attached comments, the Agencies, after carefully reviewing the Amended Work Plan, have concluded that the Amended Work Plan fails to comply with the requirements of paragraph 11 of the Settlement Agreement in numerous respects.

Here, we highlight a few overarching issues. First, unlike the Initial Environmental Site Assessment Work Plan dated October 14, 2020, which was clearly organized by the requirements in paragraph 11, the Amended Work Plan is not clearly organized around those requirements. For ease of reference and usability, Holtec must revert to the prior organizational framework. Second, like the Initial Environmental Site Assessment Work Plan, the Amended Work Plan completely lacks required information (e.g., an inventory of all structures, buildings, etc.) and is otherwise deficiently vague in its description and explanation of elements required by paragraph 11. Before the Agencies can approve the work plan, Holtec must address all of those issues. Third, the Amended Work Plan must identify the date by which Holtec anticipates submitting to the Agencies the Initial Pilgrim Site Assessment report, which is referenced in paragraph 12 of the Settlement Agreement. Finally, we remind Holtec that it must submit to the Agencies a revised work plan that addresses the deficiencies described in this letter and the accompanying comments within thirty-days of its receipt of the attached comments.

We look forward to receiving the revised work plan. In the interim, Holtec's technical team, including its licensed site professional, should feel free to reach out to Seth Pickering at the

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Massachusetts Department of Environmental Protection and Jack Priest at the Massachusetts Department of Public Health if they have any questions about the attached comments.

Sincerely,



Seth Schofield  
*Senior Appellate Counsel*

Attachment: Comments of the Massachusetts Departments of Environmental Protection and Public Health on Holtec's Amended Initial Pilgrim Environmental Site Assessment Work Plan

Cc: Jason Day (by electronic mail)  
(j.day@cdi-decom.com)