

**NUCLEAR DECOMMISSIONING CITIZENS ADVISORY PANEL
("NDCAP")**

**PSDAR and Decommissioning Working Group
Wednesday, May 9th, 2018
Plymouth Community Intermediate School, Rm. E03,
117 Long Pond Road, Plymouth, MA**

Meeting Minutes

Meeting called to order at 6:35p.m. by Working Group Chair, Joe Coughlin

NDCAP MEMBERS PRESENT:

- H. Joseph Coughlin, Member from Plymouth Nuclear Matters Committee
- John Ohrenberger, Entergy Rep
- Pine duBois, Speaker of the House Appointee
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Not present: Joe Lynch, Representative of PNPS

Also Present: Jim Lampert, Rich Rothstien, Mike Fortini

1. Minutes of April 25, 2018 minutes were reviewed, edited for clarification and approved
- 2 . The Attached email of May 7th, which was distributed at this meeting, was provided by the Chair for discussion purposes to review the Legislative letter of

April 11 as well as the Draft Findings & Recommendations presented by NDCAP Co-Chair Sean Mullin

In addition: Paragraph #4 of the Delegation's April 11 letter, it is recommended to strike the word "Governor" from the second line in that paragraph.

The below (color) reviewed by Chair Coughlin from his email

1. April 11, 2018 Letter from Ma Legislative Delegation on recommended Actions for NDCAP

Comments:

Action 1. - Support - At the end of the second sentence, add the words, "risk avoidance & control, and economic development".

Action 2. – Support as is.

Action 3 – Support

Action 4 – Support - First sentence, second line, change to read: "we recommend the creation of an interagency working group to liaise... with the PNPS and NDCAP".

Action 5 – Support – First sentence, second line, change to read: ... its residents, the interagency working group and the NDCAP should receive... ."

2. Co- NDCAP Chair's Draft Proposed Findings and Recommendations

Comments:

Finding 1. – Support – At the beginning of the last sentence change to read: "The Commonwealth currently lacks... ."

Recommendation 1. – Support – Change first sentence to read: "The NDCAP recommends the creation of an interagency work group to monitor the pre and post shutdown decommissioning process at PNPS in conjunction with the NDCAP".

In the Draft Findings & Recommendations of Sean Mullin
Recommendation #1—change the word "manage" to **monitor**.

Finding 2. – Support – Change first sentence to read: " In order to effectively protect the interests of the Commonwealth's citizens and communities, it

should negotiate and execute a detailed MOU with Entergy and / or any subsequent licensee.

Recommendation 2. – Support – First sentence change to read: “The NDCAP recommends the Commonwealth begin to immediately negotiate an MOU... .”

Finding 3. – Support as is.

Recommendation 3. – Support – First sentence, change to read: “ The NDCAP recommends ... FY 2019 to monitor the decommissioning” The second sentence, change to add at the end the words, “, as may be determined necessary.”

From the meeting: Recommendation #3 in FY 2019 work with the Licensee to ensure compliance with the MOU. In the last sentence say following “... effective and on-going ‘work’” not *oversight* “of the decommissioning process at PNPS (ADD) “as may be determined necessary”

Finding 4. – Support – Last sentence second last line, change to read, “environmental protection requirements, economic development and comprehensive financial standards and requirements.”

Recommendation 4. – First sentence, change to read: “The NDCAP recommends the Commonwealth develop ... environmental protection requirements, economic development, and comprehensive financial”

Finding 5. – Support – Support as is.

Recommendation 5. – Support - Change to read: “The NDCAP recommends the Commonwealth designate and assign ... (NRC) , the NDCAP ... at the PNPS, and provide for NDCAP representation with the interagency work group.”

At the meeting: Change Recommendation #5 to read “The NDCAP recommends the Commonwealth designate a method for the interagency work group to liase with the Town of Plymouth, NDCAP, the NRC and other federal agencies during the pre and post shutdown decommissioning process at PNPS.”

Finding 6. – Support as is.

Finding #6 at the meeting decided to remove the words “*overseeing and monitoring*” from the second and third line so it reads: “There are immediate and on-going costs and expenses the Commonwealth, the Town of Plymouth

and surrounding communities will need too pay associated with pre and post-shutdown, closure and decommissioning activities.”... Etc

Recommendation 6. – Support – First sentence, change to read: “ The NDCAP recommends the Commonwealth develop, propose and approve ... “

Discussion followed re: “billback” language and litigation by Industry vs. DOE for added costs of fuel storage

Findings & Recommendations from the Public

3. R. Rothstein’s Finding & Recommendation

Comments:

Support the inclusion of the submission into the comments received from the public, section of the NDCAP’s annual report.

Support the general recommendation which focuses on encouraging Entergy, (and / or any subsequent licensee) to adopt methods and approaches that exceed those of the NRC, to the extent feasible.

4. Mike Fortini’s Findings & Recommendations

Comments:

Support the inclusion of the submission into the comments received from the public, section of the NDCASP’s annual report.

Support the 5 recommendations that focus on: key site personnel, training and periodic audits, developing a lessons learned document, develop risk register, and develop an overall Level 1 and 3 Schedule to include an Action Item Log, as well as the two additional recommendations on adherence to Design Base Documents (added during the meeting:) “ as may be applicable to the decommissioning process” and developing and adhering to a Change Management Plan, as well as taking into consideration the seismic risk factor as a safety consideration in all decommissioning and fuel storage actions.

Mike Fortini provided a revised version of his F&R dated May 8th. (Attached) Comment from Entergy, John O., that the Design basis documents may not have changed, since they are “design basis”, rather, engineering plans and designs do change and would be documented, including abandonments of

structures, and these will all be kept up to date through the life and decommissioning of PNPS

5. Lampert's Findings & Recommendations

Comments:

Support the inclusion of the submission into the comments received from the public, section of the NDCAP's annual report.

Recommendation 1. – Move spent fuel out of wet storage asap, but NLT six years – Support

Recommendation 2. – Require PNPS licensee to maintain a supply of spare over packs for canisters of spent fuel assemblies that may leak over time. – Wait and discuss with the President of Holtec when he speaks to the NDCAP in FY 2019.

Recommendation 3. – Remove spent fuel to higher ground to take into account sea level rise. – Support concept , but wait further response from Entergy on their findings on risk exposure to dry cask storage pads.

Recommendation 4. – The PNPS PSDAR and Decommissioning plans should be based on cost estimates that assume indefinite onsite fuel storage due to the DOE not providing for such storage, but allow such costs estimates and plans to be modified as appropriate if and when the DOE provides for the removal of spent fuel to off-site storage. – Support

Recommendation 5. – Allow no contaminated rubblized concrete or other material to remain on site at the PNPS once the NRC releases the site. – Needs more discussion by the NDCAP.

Recommendation 6. – Dismantling the PNPS facility should begin as soon as possible after shutdown, removing all radioactive and hazardous contaminants asap, and decontaminate the overall site to a level allowing the NRC to release the site for unrestricted use. – Support.

Recommendation 7. - Entergy develop and implement a compliance document for ensuring the Commonwealth's residual radiation level requirements are met during the decommissioning process and are accomplished in accordance with the mechanism set out in the MDPH's April 10, 2018 letter to Entergy. – Support.

Recommendation 8. – Entergy and /or any future PNPS licensee, be required to the MDPH should continue offsite radiological monitoring & testing, including real-time, offsite environmental sampling & testing, onsite well monitoring & media sampling providing the funds necessary to the Commonwealth to do so, so long as any spent fuel remains at the PNPS. – Support.

Recommendation 9. – Similar in general to the Emergency Planning recommendation #2 of the NDCAP PSDAR Work Group.

Recommendation 10. – Similar in general to the NDCAP's PSDAR WG's recommendation #9 on the DTF.

Recommendation 11. – Require a NEPA compliant analysis of all potential environmental and economic impacts of the licensees post closure plans prior to the submission of the PSDAR & decommissioning plans to assure accurate cost estimates. – Needs more discussion by NDCAP.

Recommendation 12. – Provide adequate funding for NDCAP to carry out its responsibilities. – Support, similar to NDCAP's Co-chair's recommendation # 3. – Support.

Recommendation 13. – Establish and fund an Ma. Interagency working group, similar to NDCAP's co-chair recommendation # 1., and Ma. legislative delegation letter actions # 4 & 5 as amended above. – Support

The Lamperts provided an update by email which is attached

In discussion of Design Basis documents as the basis guiding for decommissioning, John Ohrenberger said that the Design Basis Doc MAY not change, but entering change and design changes (and) abandonments will be kept up to date through an accepted process and this could be used during decommissioning

- Meeting adjourned 8:34

Draft Prepared/ Pine duBois, as Draft 05.14.18