NUCLEAR DECOMMISSIONING CITIZENS ADVISORY PANEL ("NDCAP") PSDAR and Decommissioning Working Group

Wednesday, October 11, 2017

Plymouth Community Intermediate School, Room E03, 117 Long Pond Road, Plymouth, MA
Meeting Minutes

Meeting called to order at 6:30 p.m. by NDCAP representative

NDCAP MEMBERS PRESENT:

- H. Joseph Coughlin, Member from Plymouth Nuclear Matters Committee
- Pine duBois, Speaker of the House Appointee
- Richard Grassie, Minority Leader of the House Appointee
- Heather Lightner, Representative of the Town of Plymouth
- John Ohrenberger, Representative of Pilgrim Nuclear Power Station
- Joe Lynch, Representative of Pilgrim Nuclear Power Station

NDCAP MEMBERS NOT PRESENT: None

MEETING MINUTES

- 1. A PSDAR and Decommissioning Working Group Agenda were published prior to the meeting. Discussions and comments followed this agenda.
- 2. After Call to Order, Joe Coughlin was elected Chair of the Working Group.
- 3. Thereafter it was decided by the WG that taking and preparing the WG Minutes would revolve through each of the WG members for each meeting.
- 4. The Schedule of Future WG meetings was not discussed, although it was presumed that the NDCAP Chair's suggestion that monthly meetings be held was followed.
- 5. Considerable discussion and comment was then centered on the scope and inquiry for the WG, as follows. WG members emphasized the importance of the PSDAR to the Decommissioning process. The general scope of the WG was discussed and all in attendance emphasized the importance of researching the NRC's Guidelines and Directives on the PSDAR scope and preparation. Although by NRC directive due within two years after the plant shuts down, Entergy representatives indicated it was likely to be developed and submitted for review way ahead of the two year requirement.
- 6. One member suggested the WG inquire NRC about which specific directives applied and where we as a WG can make the most impact. Another WG member suggested Entergy be the source of inquiry and that specific Rules also be on Decommissioning be included in that inquiry. One member doubted the NRC would offer any opinions and would therefore reference the specific requirements in NRC Rules, Directives and Guidelines.
- 7. The WG Chair emphasized the need for the Working Group to focus on the actions and process for PSDAR & Decommissioning, while emphasizing the mission, meetings and research associated with Working Group activities. Additionally, the Chair emphasized the importance of our WG contributing to the overall Annual Report of the NDCAP to the Commonwealth, especially related to the PSDAR/Decommissioning requirements of the NRC, State and any local influences. A suggestion was made that the WG become familiar with the NRC rules and guidelines and how other plants undergoing decommissioning had bolstered their Panel's understanding of the Decommissioning process.
- 8. A comment was made that the NRC continued to focus on enhancing the effectiveness of the Decommissioning Program through a comprehensive effort to consolidate and update decommissioning guidance. To date that guidance in the form of a Decommissioning Rule has not been forthcoming from the NRC.
- 9. Entergy representative pointed out that the State of Vermont was given the opportunity to comment on the VT Yankee PSDAR and that the PSDAR had a number of referenced documents which the MASS NDCAP WG's could refer to in bolstering our understanding of the PSDAR and Decommissioning process. A comment was made by one WG member that we should probably review the VT legislation that is

- over and above MASS laws relating to decommissioning. Another member suggested that rather than review VT legislation on decommissioning we should concentrate on lessons learned.
- 10. One member suggested that Entergy had offered to make a presentation to the WG on the PSDAR and the Decommissioning process for PNPS and that we should schedule that presentation for the next WG meeting. The Entergy representative agreed to that request and a presentation will be given at the next WG meeting. Another member suggested that this presentation include references to the VT Yankee experience and that Entergy should also indicate their lessons learned from that experiences plus the cost estimating as part of the PSDAR as well. Another member suggested the WG focus on the VT Yankee NDCAP reports for guidance on what we need to produce, especially in terms of our NDCAP's Annual Report.
- 11. The Entergy spokesperson referenced the VT Yankee experience and mentioned that Entergy had not determined whether Pilgrim would be SAFSTOR or DECON and that decision would hinge to a large extent upon monies available in the Decommissioning Trust Fund. Another WG member asked Entergy to include in next month's presentation useful comments on the VT Yankee experience compared to the anticipated experience with Pilgrim going through the decommissioning process.
- 12. In terms of comments on the PSDAR, it was pointed out that there was a 90 day comment period for VT Yankee and that all of VT Yankee's comments were sent to the NRC. These comments included VT NDCAP issues with respect to non-radiological and radiological cleanup, how asbestos cleanup would be conducted, and rubblization standards, among others.
- 13. Some discussion centered on the decommissioning of Yankee Rowe and how that process would be helpful to the NDCAP and its WG's in determining the impact of decommissioning, current NRC Rules and the responsibilities of the various agencies involved. One member emphasized the importance of the decommissioning process and how the scope of our PNPP decommissioning process should be accomplished in accordance with NRC rules and regulations in addition to other interested agencies.
- 14. One WG member asked how we will work with other WG's on our NDCAP to assure there is transfer of lessons learned according to assigned subject areas. It was recommended that this item be included on the NDCAP Agenda for a future meeting.
- 15. The WG Chair stressed the need to identify relevant PSDAR/Decommissioning documents that should be added to the NDCAP's web site and that the various sources be arranged and structured on the web site according to ease of identification relative to the NDCAP's WG's inquiries.

PUBLIC COMMENT

- 1. One member of the public with decommissioning background suggested that the NDCAP and WG had a variety or resources available on plant decommissioning, namely lessons learned from other plants going through decommissioning, most notably the experience and lessons learned from the decommissioning of Yankee Rowe.
- 2. The Chair underscored a previous comment made at the meeting that relevant documents on decommissioning and the associated PSDAR need to be identified, which would become the basis for structuring the NDCAP Web Site.
- 3. Another member of the public pointed out that Pilgrim Watch had forwarded copies of relevant documents to members of the Working Group prior to the meeting. These documents included: comments from the State of VT on the VY PSDAR, a copy of the Northstar PSDAR, the 2008 Pilgrim Preliminary Cost Estimate for Decommissioning, and a copy of the testimony of William Irwin, Sc.D, CHP (April 20, 2015) commenting on Entergy Nuclear Operation, Inc.'s Planned Use of the Vermont Yankee Nuclear Decommissioning Trust Fund.
- 4. With respect to the role of the WG, one public suggestion was to focus on the PSDAR Table of Contents as containing key topics to be included in our WG mission statement. A related comment was that each member should do their own individual inquiry into PSDAR/Decommissioning process and that the WG should focus on assembling and structuring the relevant documents (rules, Guidelines, etc.) on the NDCAP Web Site for ease of inquiry.

WRAP UP AND ADJOURN: there was a motion to adjourn at 0830 and it was seconded.