

# **NUCLEAR DECOMMISSIONING CITIZENS ADVISORY PANEL (“NDCAP”)**

**Monday March 24, 2025**

**Hybrid Meeting (in-person and virtual)**

## **Meeting Minutes**

### **NDCAP MEMBERS PRESENT**

- David Noyes, Compliance Manager Holtec Decommissioning International (in-person)
- John Moylan, Site Vice President Holtec (in-person)
- Pine duBois, Speaker of the House of Representative Appointee (in-person)
- Mary Jo Gatslick, Vice Chair; Minority Leader of the Senate Appointee (in-person)
- Kevin Canty, NDCAP Chair; Vice Chair Plymouth Select Board; Representing Plymouth Select Board (in-person)
- James Lampert, Speaker of the House Appointee (in-person)
- Mary Lampert, Senate President Appointee (in-person)
- Dr. Barry Potvin, Chair Plymouth Board of Health; Senate President Appointee (in-person)
- Jack Priest, Division Director of the Radiation Control Program for the Department of Public Health; Representing the Commissioner for Department of Public Health (in-person)
- David Bryant, Assistant Director of Preparedness and Planning for Massachusetts Emergency Management Agency (in-person)
- Mary Waldron, Representing Old Colony Planning Council (virtual)
- Andrew Gottlieb, Association to Preserve Cape Cod; Governor Baker Appointee (virtual)
- Greg Wade, Representing Massachusetts Department of Public Utilities Appointee (virtual)
- Kris Callahan, Representing Executive Office of Health and Human Services (virtual)
- Mike Fortini, Senate Minority Leader Appointee (virtual)

### **14 CMR 188.00**

- Kevin Canty begins the meeting with a reading of the enabling statute; outlining the purpose, responsibilities and duties of the Nuclear Decommissioning Citizens Advisory Panel. This statute will be read out at the beginning of each meeting going forward.
- James Lampert makes a suggestion that subsections A-I be circulated to all the panel members for review on important topics such as voting requirements, who the members are, etc.

- Kevin Canty mentions that the NDCAP website and member list are being updated.
- Mary Lampert makes reference to the recent meeting agenda which mentions diversity and makes a comment that the current panel does not seem very diverse. She suggests that the Board in Plymouth consider the vacant appointment be someone from the Wampanoag Tribe.
- James Lampert references a couple of current vacancies on the Plymouth Select Board. Kevin Canty confirms that they are working on filling those at this time.
- Pine duBois has information that she will follow-up and email to Kevin Canty regarding the seat reserved for the Nuclear Matters Committee.

David Noyes (Holtec) provides an update:

### **WATERFALL CHART**

- The presentation begins with a review of the Waterfall Chart (specific swim lanes of note are the project milestones which have not changed). The next upcoming major milestone is submitting the license termination plan which will be submitted to the NRC in September of this year. There are updates within the slide presentation regarding dismantlement and demolition. In addition, there will be updates on reactor segmentation and waste processing. For characterization, Holtec has submitted with MassDEP an asbestos plan for being able to take core boards for the asbestos paint for the concrete that will enable Holtec to characterize the foundations and the floors of the below grade structures.

### **ONGOING DEMOLITION UPDATE**

- The transition at the site has gone from building demolition to component removals from within the individual process buildings,
- Augmented Offgas Building: removal of remaining Asbestos Containing Material piping and ductwork- Completed; Completion of equipment removal- March 2025. The building will be demolished once Holtec has removed the other process buildings.
- Combined Intermediate Valves: Abatement Plan Submission to Department of Environmental Protection- April 2025. Turbine valves (20 inch steam line valves) that connect high pressure to low pressure turbine. Those will undergo asbestos abatement. Holtec is finalizing plans for submission to DEP for removal of asbestos material on those valves.
- Gland Seal Condenser: Abatement Plan Submission to Department of Environmental Protection- March 2025. Removal of asbestos insulation and gaskets that are associated with the Gland Seal Condenser.

### **DEMOLITION STATUS DRAWING**

- There have been no changes to the diagram of the building demolition. The augmented offgas building (light yellow on the slide) and the remaining buildings; the status has not changed. Nor has the status of any above ground or underground storage tanks; all those have been removed.

## **MASSACHUSETTS CONTINGENCY PLAN ACTIONS**

- Phase II Comprehensive Site Assessment Report and Risk Characterization due April 2025
- Investigative Plan design by Licensed Site Professionals
- Phase II Objectives: Define the source, nature and extent of constituents of concern; Report on any additional investigations performed; Risk Characterization.
- 14 Additional Monitoring Wells in PERA-3 (non-industrial) area
- 17 Soil Borings in the industrial area
- Holtec will report on the results of that sampling at the next meeting

## **ONSITE WATER VOLUME UPDATE**

- Water volume onsite effective 3/20/25= 844, 037 gallons
- Heaters in Spent Fuel Pool and Reactor Cavity were de-energized on 3/18/25; they are no longer required for building and refueling floor heating this season. They have been secured, and the current plan would not reenergize them until the heating season at the end of 2025.
- Holtec is making preparations to drain the reactor cavity and dryer separator pit to the torus in April.

## **REACTOR CAVITY DRAIN DOWN**

- That specific evolution will lead to the draining of approximately 460,000 gallons from the Reactor Cavity and Dryer Separator Pit; the draining of that water will result in that water being accumulated in the torus.
- Spent Fuel Pool (SFP) will remain filled with water to support waste processing
- The plan is to retain 425,000 gallons drained from Rx Cavity and Dryer Separator Pit (DSP) to Torus
- The Torus has a capacity of 1.6 million gallons so there is adequate capacity for full drain down.
- The current plan is to retain approximately 400,000 gallons in the Spent Fuel Pool. There is waste material that is still being staged in the Spent Fuel Pool; ultimately that material will need to be packaged and removed. Holtec has yet to schedule the activity to perform that work.

## **REGULATORY UPDATE**

- NRC Violation of Security Requirements details of which were considered to be Security Sensitive; it involves an event that took place in January 2020; the NRC credited that condition was self-identified and corrective actions had already been taken to resolve the issue.
- NRC Violation of low safety significance when a tear was identified in a shipping package for a radiological component that was being sent from Pilgrim to Oyster Creek. There was no release of radioactive material to the environment, but the violation identified that Holtec had failed to properly restrain the item in a manner that resulted in breach of the package during transport.

- NRC exercised enforcement discretion for discrepancies identified during the extent of condition review for decommissioning trust fund expenditures. The review is up to date and complete. Holtec is 100 percent up to date with the decommissioning trust fund and making whole the trust fund of all the inappropriate expenditures including interest.

#### **SITE SOURCE TERM REDUCTION**

- Holtec continues with Class A and some Class B Waste (\*shipping that as soon as it is generated). In 2025- Holtec shipped just over 10,000 cubic feet of dry radioactive waste volume with a curie content of 86. The total to date: just under 2000 curies and just under 300,000 cubic feet of materials since the beginning of the decommissioning activities.

#### **SOLID RADIOACTIVE WASTE SHIPMENTS**

- Used for Class B and some Class A wastes
- 100% Stainless steel construction inside and out (2 casks)
- Cask stands 11 feet high, 8.5 feet in diameter
- Accommodates containers of resins and filters up to 160 cubic feet and 15,000 lbs.
- Holtec has to very closely plan those shipments; determine the amount of material that can be put in; the types of materials that can be combined to meet transport and disposal requirements.

#### **FOLLOW-UP QUESTIONS FOR DAVID NOYES**

- James Lampert asks the first question related to the last slide of the presentation: do you use their casks to transport this? David Noyes replies yes. The casks have impact limiters (those are the bar bell shapes at the top and bottom) and they also accommodate a significant amount of shielding within the cask; that is why it can only accommodate 160 cubic feet. James Lampert then asks: do you use any type of cask for shipping the other thousands of cubic feet of low-level radioactive solid waste. David Noyes replies: we use many different kinds of packages; the NRC licenses several different types of packages including things like sea cans/CONEX boxes that are typically put on the back of a truck. Sometimes- we carry them to Mansfield and then multiple ones are put on a rail. James Lampert asks to go back to slide 9: do you have any idea what cubic feet works out to in tons? David Noyes replies: I don't- in one of the earlier presentations- I think I did provide that. David Noyes does not have it available this evening. Holtec will be able to provide that information. James Lampert requests that it be sent along. James Lampert asks to go back to slide 7: he has a couple of questions. At the top- you have the spent fuel pool, the RX cavity and the DSP. How many of those are open at the top? David Noyes replies: all of them. James Lampert then asks a question on the numbers: at 425,000 gallons here, that is not what you get when you add the Rx cavity and the DSP together. David Noyes replies: with the connecting areas between the reactor cavity and the dryer separator pit; there is an additional volume when those shield plugs are removed. So- that makes up the difference. James Lampert clarifies: so, 425,000 is the sum of the two blocks plus the other two. David Noyes replies: that's correct. James Lampert then asks to go back to slide 5: a couple of questions- what is the purpose of the soil borings in the Industrial area? David Noyes replies: they are to assess where some of the items that were identified during our

groundwater sampling to get closer to the surface to determine whether there has been any active release within the Industrial area that contributed to the positive identification of those materials in the groundwater. James Lampert replies: So, what you are looking for is radioactive materials- is that accurate? David Noyes replies: no- this is non-radioactive material. James Lampert asks: so, what are you looking for? David Noyes replies: there were items that were identified within the Industrial area including PFAS, vanadium, and there were a couple of other metals, as well. James Lampert asks: and on the top of the slide- where are those monitoring wells- are they in what is referred to as the donut hole? David Noyes replies: they are on that roadway; so that access way; there are two: one is on the Eversource right of way- underneath the high lines. There is one of them that is off the right of that roadway so opposite where we identified the PCB piles. So that roadway going back toward the right of way- PCB piles on the left hand side; we did the new monitoring well on the right hand side. James Lampert then asks: what are you monitoring for? David Noyes replies: it is a sampling for all non-radiological constituents. James Lampert asks: what drove you to decide that you needed more monitoring wells? David Noyes replies: we identified the constituents that were identified two years ago; when we identified the PFAS- in that area- in order to be able to determine the source, nature and extent of the PFAS; the groundwater monitoring wells will help support that. James Lampert then asks: are they also looking for potential chemical leakage in the donut hole area? David Noyes replies: no- they are not specifically looking for that. A member of the panel asks for clarification on the donut hole area. James Lampert replies that if there was a map up there it would be very easy to show the panel with an overhead view. It is an area in which there were a lot of trees planted- many of which have died; my understanding is that there was a lot of stuff buried there that basically caused the death of those trees. David Noyes replies: I don't think we found in our initial characterization- the presence of anything other than PCBs from our sampling. James Lampert replies: I think that's accurate from what your characterization said.

- Pine DuBois asks: referring to slide 5; when you do the comprehensive site assessment report in April; can you send that around to us? David Noyes replies: yes- we will publish the results.
- Mary Lampert asks: on the last slide of the presentation; the cask is 11 feet high. Are there any overpasses on 44 for example or any egress route that the waste would leave; that would not accommodate 11 foot high? David Noyes replies: no- there isn't. We planned the route with an understanding of the heights of overpasses and any physical obstructions lately because the work that was associated with the plantation highway; we needed to reroute one of the shipments. Mary Lampert replies: I remembered on 44- the DOE identified a problem. David Noyes replies: I don't know of any. I know we do specifically plan out the route to be able to accommodate whatever the conveyance is. Jack Priest clarifies: that's with the concurrence of the State Police, as well- correct?. David Noyes replies: yes. Mary Lampert asks: as far as draining down to the torus; is there any way to estimate or have you estimated the evaporation rate from the torus versus if the water is on the reactor cavity floor, or in the pool or what have you. David Noyes replies: we haven't estimated it; it would be considerably less. The surface area is less to begin with and there were only two openings to the torus compartment to man way hatches that provide access-

that allow an exchange of air that would support the evaporation. So- we haven't quantified it but it's considerably less than the open pools. Mary Lampert replies: that is what I would expect. Back to the transportation cask, has there been a side impact analysis of it? David Noyes replies- yes there has and that is part of the licensing.

- Andrew Gottlieb has a question: the package tear that you mentioned led to an NRC violation. When did that occur? David Noyes replies: that occurred in the fourth quarter of last year. Andrew Gottlieb asks: and when was the NRC notified about it? David Noyes replies: they were notified as soon as it was identified at Oyster Creek during the removal of the material from the trailer. Andrew Gottlieb then asks: you were typically precise in your wording and description of the audit that was done, and it was good to hear that there was complete restitution plus interest made for the inappropriate expenses. I'm not sure that I heard you say that the NRC did not find any other misuses of trust funds; is it accurate to say that? David Noyes replies: no, it's not accurate. They found three instances where we had continued to pay for telecommunications at offsite facilities that were no longer required. And those were the subject of the enforcement discretion. So- there were three instances; four facilities within the Town of Plymouth, where we continued to pay Comcast bills. Andrew Gottlieb asks: what's your estimate of how much evaporated loss you induced this heating season; from November to March? David Noyes replies: I haven't looked closely at it. I think we are probably around; I don't know. I would hate to put a number on it. We did briefly in September when we turned the heaters on as to what the volume was; we provided that information to Mary so we could do the subtraction. I can provide that information. Andrew Gottlieb replies: I would like to put a number on that so if you could follow up on that. Lastly, to date- can you report on how much of the trust fund money has been spent on the preparation of your appeal for the permit denial? David Noyes replies: no; I don't have that information. Andrew Gottlieb asks: is that something that can be provided to the committee? We have an overriding interest in the solvency of the fund. So- if this is a significant expense; it would be relevant for us to know that information. David Noyes replies: well, we will be reporting at the end of this month on the status; the annual status of the decommissioning fund. It might make sense for us to do a holistic look at the health of the fund based on the submittal. Andrew Gottlieb replies; understood but in the past; when asked about specific expenses, you redirected me to the annual report and it's not at a level of granularity that could let us know what the detailed expenses were. So- that's not a satisfying answer. This is not a proprietary question which has sometimes been the reason why other information hasn't been revealed. This is a public process that you are voluntarily going in to; I think it would be relevant to know what that is and ask you to report back at the next meeting. I think it is a fair thing to ask. David Noyes replies: well, I would consider that what we spend on legal fees would be proprietary and the assessment of what remains in the decommissioning fund; we assess it to ensure that we've got adequate funding remaining in order to be able to complete the decommissioning activity, the NRC independently looks at it and assesses it. Andrew Gottlieb replies: what is not proprietary? Every granular level: other than high level things that have never been asked about in this NDCAP process have all been deemed to be proprietary. David Noyes replies: well- you asked for information like what individuals working at the plant were being paid and now what we are paying for legal fees; that's certainly business sensitive information. Andrew

Gottlieb replies: I don't know why what you are paying to appeal a public permit with public resources; why that is proprietary. It's just information. How does that put you at a disadvantage to your competitors? David Noyes replies: because it is the terms and conditions of legal agreements with our counsel. Andrew Gottlieb replies: no. I'm just asking what's been spent on a legal defense that you entered in to voluntarily that takes money away from potentially other decontamination and decommissioning processes. What is wrong with that? I'm not asking for your legal terms. I know who you hired. I'm just looking for the gross amount of money that you are spending on this appeal.

- Kevin Canty asks: do you think Mr. Noyes: although you can't get into the specifics of what is spent with counsel; you could give an overall at the next meeting, perhaps- an overall expense on what has been expended on legal fees without an itemized report? David Noyes replies: I can take that request back. I wouldn't want to commit to being able to provide that at the next meeting without discussing it with counsel. Kevin Canty replies; I understand.
- Barry Potvin has questions regarding the water volume. Do you know how much water is currently in the torus? David Noyes replies: there is about 45,000 gallons in the torus. Barry Potvin replies: and you stated that there is currently about 844,000 gallons remaining total. David Noyes replies: that's correct. Barry Potvin replies: so- I did look at the numbers from last November's meeting and again at the one in January; and the water volume seemed to have dropped by about 47,000 gallons. So- is it safe to assume that- that was evaporated? David Noyes replies: yes. Barry Potvin replies: and if you look at that number compared with the one you just gave us which was 844,000 gallons; I believe remaining. David Noyes replies: right. Barry Potvin replies: it seems like there is less water having been lost than in the previous two months than in the past two months. Can you explain why that evaporation rate has dropped? David Noyes replies: it really just depends on a lot of conditions like the humidity, the differential temperature on the refuel floor, air flow that is very case specific depending on the work activities that are happening on the refuel floor. So- it varies from shift to shift. Barry Potvin replies: and you mentioned that you already retain about 400,000 gallons on the spent fuel pool for some time. Is that correct? David Noyes replies; yes- that's right. Barry Potvin replies: is that the volume that's currently in the spent fuel pool? David Noyes replies: yes. Barry Potvin replies: then you also stated; that around mid-April or sometime in April; you will be transferring the remaining water from the reactor cavity and the dryer separator pit which comes to about 460,000 gallons. David Noyes replies: that's right. That will go into the torus. Barry Potvin replies: so- if I do the math correctly; adding the 40,000 gallons; about 45,000 that is currently in the torus to the 460,000 that is still to be transferred; that's around 505,000 gallons and another 400,000 gallons that's currently in the spent fuel pool. That's more than 844,000 gallons. David Noyes replies: the difference is the capacity of the spent fuel pool; right now- the water level is not right up to the height of the floor level. The water has dropped down; almost a foot and that accounts for the difference. Barry Potvin replies: it was a little bit confusing. David Noyes replies: yes- those numbers that are on that drawing are capacities; not what exists in those volumes currently.
- James Lampert asks: you mentioned hatches in the torus. Are those normally closed or open? David Noyes replies: they are open.

## **INTERAGENCY WORK (IWG) REPORT**

- Jack Priest provides the update for the state since Seth Pickering has retired. MassDEP is working on identifying his replacement to fill this seat on the NDCAP and would expect to have a replacement for the next meeting.
- The IWG is working on a standard letter for appointment/reappointments to the NDCAP as one has not existed previously. So- we are trying to standardize that for the state members that are on the NDCAP panel and then we can keep that up to date, so it does not fall behind. I have been reappointed for the DPH. EEA's NDCAP Coordinator is Paolo DiFabio, and he is working to update the current NDCAP roster. So- you mentioned previously that it had been some time since it had been updated. Paolo DiFabio will use the March 24<sup>th</sup> meeting minutes as a final verifier for the current appointments. If members are aware of their start and stop dates, it would be valuable information to share with Paolo or myself. I will get that information over to Paolo.
- There is a new comments submission page that has been added to the NDCAP website which will allow the Chair and Vice Chair to receive public submissions directly. This will replace the previously listed email addresses. So- we are working on updates to the webpage. We are trying to make it more public friendly and more communication friendly. The suggestions earlier about the subsections and the requirements and the duties for the NDCAP. I'll bring that feedback back to Paolo and that sounded like a good idea to me. We will try to get that addressed on the webpage to make that page more public user friendly.

## **APPROVAL OF PREVIOUS MEETING MINUTES**

- Kevin Canty sent out copies of the November and January meeting minutes. He also sent a copy of the September meeting minutes because they are not posted on the website yet. The September meeting minutes have been approved.
- James Lampert makes a motion that the November meeting minutes with the additions and corrections noted. Mary Gatslick seconds the motion (unanimous approval; 1 abstention)
- James Lampert makes a motion that the January meeting minutes with the revisions, additions and clarifications outlined in the earlier discussion. Mary Gatslick seconds the discussion (unanimous approval)

## **PUBLIC COMMENTS**

NDCAP has allotted thirty minutes on the agenda for public comments and questions for the panel. Each citizen that would like to participate is given five minutes at the podium.

- First Citizen: Elaine Dickinson; member of the Cape Downwinders. Diane Turco is our director and unable to attend tonight's meeting. Elaine Dickinson will be reading the statement on her behalf. One of your responsibilities as the NDCAP is to advise our Governor and we call on you to advise Governor Maura Healey to enforce state environmental laws and regulations to immediately prohibit Holtec's illegal radioactive airborne pollution discharge of Pilgrim's Industrial Wastewater as Holtec is using this method as their active alternative to dumping directly into the Bay. For background, throughout 2022; Holtec insisted they could



dump the Industrial Wastewater into the Cape Cod Bay in clear violation of notice by the EPA and MassDEP that this discharge was not allowed under the law. Finally, the EPA threatened Holtec with jail time if they did dump without a new permit. So Holtec pivoted to installing immersion heaters to evaporate the wastewater. We learned of that dangerous discharge from a whistleblower letter which included serious allegations of worker and public health and safety concerns still independently uninvestigated and unresolved. In addition, even though Holtec signed the settlement agreement with the state to abide by all state laws and regulations with no federal preemption; Holtec immediately appealed to the MassDEP's decision to deny the dumping permit. Holtec still would like to dump but in the meantime, they will evaporate the industrial radioactive wastewater directly polluting our air, Cape Cod Bay and communities. This forced evaporation is the primary method of discharge choice while Holtec also allows for passive evaporation without instituting any mitigation plans to prevent radionuclides from entering our environment. There are multiple laws and regulations that the state must enforce. For example, the Ocean Sanctuaries Act, which the MassDEP used to deny the surface water discharge permit includes waste means any unwanted, discarded or environmentally harmful solid, liquid or gaseous materials resulting from commercial, municipal, domestic or industrial activities. The MassDEP regulations even include in the definition of air contaminant radioactive materials radiation. As such, Cape Downwinders request that the NDCAP advise the Governor to enforce state laws and regulations to prohibit Holtec's airborne pollution method of discharge of the radiological and chemically contaminated industrial wastewater at Plymouth. We would please, the public, like to have a report back at our next NDCAP as to what the Governor answers you. Thank you.

- Second Citizen: Rosemary Shields; League of Women Voters in the Cape Cod area. I would like to enter into the NDCAP minutes; I'm going to give you a copy of this Commonwealth Beacon article and I'm going to read a portion of it for the audience or Zoom. In this article, a warning about radioactive air pollution from Pilgrim. It says that Dr. Richard Clapp (former Massachusetts State Cancer Epidemiologist and Professor of Environmental Health at Boston University School of Public Health) said airborne releases from Pilgrim in 1974 and 1975 were due to bad cladding on the fuel rods which require that radioactive steam had to be released out of the reactor building stacked to relieve the pressure. If this steam had not been released, the plant would not have been able to keep operating. Clapp's study showed that infant mortality, thyroid cancer and leukemia were all significantly increased after this venting of radioactive vapor. The cancer footprint from this practice he said; started showing up early, the excess leukemia showed up in 1982 and 1984 time period. But infant mortality increased even earlier in the mid 1970's earlier than the leukemia excess. This is consistent with the timing of the aerosol radiation releases. Aerosol release of radionuclides via evaporation of radioactive wastewater poses a clear risk to the health of surrounding communities. This release of radio nuclides is a form of air pollution. Massachusetts is taking action on asbestos released during the Pilgrim decommissioning process, which is an important measure that will benefit health, but the state must go further enforcing our air pollution laws. Dr. Clapp noted that because so many Pilgrim workers had exceeded their annual allowed radiation dose; the plant was shut down for extended maintenance at one point in the 1980's. News coverage at the time indicated that Pilgrim had overexposed more

workers than any other US nuclear plant the same time period, he said. Holtec has told the Plymouth community that aerosolizing radioactive waste is a safe method of disposal, yet they have provided no data to support this claim. The Massachusetts Medical Society has called for scientific study of the Pilgrim Nuclear Plant Decommissioning process and potential health effects on workers, residents and the environment. Likewise, Dr. Buesseler of Woods Hole has called for a radiological impact assessment and a reanalysis of the water by an independent lab and using more sensitive methods to make a more complete analysis. Aerosol release of radio nuclides via evaporation of radioactive wastewater poses a clear risk to the health of surrounding communities. This release of radio nuclides is a form of air pollution. Massachusetts has taken on asbestos release during the Pilgrim Decommissioning process which is an important message that will measure that will benefit the health, but the state must go further enforcing our air pollution laws which prohibit the emission of radioactive materials in ambient air. And I'm going to give you a copy of this report so that it can be put into the minutes. Kevin Canty lets the citizen know that it can be uploaded using the comments section that is on the website. You can attach a file to your comment. Rosemary Shields asks: has that been updated? Kevin Canty replies; it is. If you have a digital copy of that, go on the website and upload. Rosemary Shields replies: I will do that, thank you very much.

- Third Citizen: Douglas Long; Orleans Cape Cod Resident (28 miles from Pilgrim Nuclear Power Plant) and anything that is emitted from that plant today. I am 28 miles away; Provincetown is 18 miles away. So, a lot of us on Cape Cod are worried because we are downwind about 40% of the time from northern winds and anything as small as a radioactive particle; it's pretty light and rides on the wind pretty easily. Nonetheless, that is why I and many of my friends and associates are concerned. I'm a member of Cape Downwinders and Save Our Bay. We are concerned about the dumping program into Cape Cod Bay of what was then a million gallons. May I ask a question to see if there is an answer. Is Holtec continuing to plan to dump radioactive wastewater into Cape Cod Bay? David Noyes replies: we are planning to continue to discharge the water following the appeal that we made on the surface water discharge permit. Douglas Long replies: so, if you win the appeal, you will dump into Cape Cod Bay. David Noyes replies: we will discharge into Cape Cod Bay- yes- as it has for the past forty four years. Douglas Long replies: but not in a quantity of a million gallons at the same time. David Noyes replies: there were years when the plant discharged upwards of five million gallons. Douglas Long replies: but that's recirculated and not right out of the torus. David Noyes replies: that was the water that was discharged- the processed water. Douglas Long replies: the cooling water? David Noyes replies: no, it wasn't the processed water that was used for dilution. It was the rad wastewater that was discharged. Douglas Long replies: so, this is actually less than a problem then it has been for forty years. David Noyes replies: absolutely. Douglas Long replies: I'm so glad to know that. This is horrible. Next question the evaporation program; the process of using heaters now in the winter because the workers were cold. I think that was an argument. I think you said that you were going to stop using the heaters in the summer. David Noyes replies: that's correct. We have no plans to use them in the summer. Douglas Long replies: but the evaporation will continue with fans or something. David Noyes replies: through the normal evaporative process for an open pool; it will continue to evaporate. Douglas Long replies: and it exits through vents. David Noyes

replies: that's correct. Monitored vents. Douglas Long replies: I understand also that there are mechanical filters that try to keep some of the radioactivity out of the lungs of the people that live on Cape Cod. David Noyes replies: there are no mechanical filters in the gaseous effluent flow stream. There is mechanical filtration of the source water in the pool. It's being continuously recirculated and filtered. Douglas Long replies: for forty years they have been releasing radioactive materials on a daily basis; small quantities but compared to today; it seems like a lot more today. David Noyes replies: It was much higher concentrations when the plant was operating. Douglas Long replies: so, radioactivity is being vented today, has been and will continue for how long do you think? David Noyes replies: as long as there is open water in those pools that are subject to evaporation. They will be monitored; the results of that effluent will be reported to the NRC with copies to the Commonwealth of Massachusetts. So that we understand exactly what the impact is. Douglas Long replies; how long do you think this is going to take? He further asks if there is a Plan A or Plan B. David Noyes replies: that he has no idea of the timeline. Douglas Long replies: he is very concerned about future generations and the fact that there is no definitive end time for this process. David Noyes replies: it is important to note that all of the gaseous effluence from the plant is measured, quantified and the biological effect to the most limiting individual at the site boundary is calculated every year. It's consistently on the order of about one tenth of a millirem so probably in the order of 1/100 of a dental x-ray. Douglas Long replies: he refers to a nuclear physicist that said that no level of radiation is safe which leads me to my final comment. We are changing the name of Cape Cod Bay to Tridium Bay.

- Fourth Citizen: Brian Campbell; Retired electrical engineer. He strongly supports Holtec's process of discharging treated water from Pilgrim Nuclear Station into Cape Cod Bay. He then cites example of how Holtec is safely decommissioning Indian Point Nuclear in New York. The presentations by Holtec to this panel shows them to be a good corporate citizen performing the Pilgrim Decommissioning in an open and truthful manner that should be commended. He cites an article from Power Magazine in 2022 by Paul Miller; a progress report that will benefit the Town of Plymouth allowing for redevelopment. He feels that the panel has done everything to delay this process.

### **PROPOSED ANNUAL REPORT**

- The report was included in the materials that had been sent out to the panel. There is time dedicated on the agenda to discuss the report and vote on it so the panel can finalize and send it to the Governor pursuant to the enabling statute. Mary Gatslick states that the report the panel received did not include the November presentation and meeting minutes since they hadn't been approved yet. Once they are approved, they will be inserted into the report and it will be presented to you, in draft form. James Lampert makes a comment regarding the report and votes against the report. Mary Lampert makes a comment and votes against the report. She mentions that there are no discussions regarding the principal issues and problems. She also mentions that they have the inability to vote on anything and no collective input on important issues such as spent fuel, clean-up, money, etc. She recently attended a Clark University Conference of New England reactors and people asked what is wrong with your NDCAP as compared to Vermont. If you compare the videos, reports, subcommittees, votes with what is going on here. There is a good group of people on this panel but there is a

procedural issue that we can hopefully address. We are not getting to the business and satisfying our requirement to the Legislature, the public and the Governor. Pine duBois makes comment that she got a lot out of reading the minutes and the summary. The information on the website will be useful. We do not need to include everyone's opinion when providing information to the Governor. Holtec's slides are very informative and very helpful as to what is happening at the site, what buildings have come down, and what is left to do. Mary Gatslick makes a motion to approve the annual report including the approved minutes from November. Pine duBois seconds the motion. (12 in favor, 2 opposition, 1 abstention)

### **PROPOSED FUTURE AGENDA TOPICS**

- MCP Phase III Report (due to MassDEP; end of April); David Noyes will include and expand as part of Holtec's presentation.
- Holtec Decommissioning Fund (update end of March each year); include as part of Holtec's presentation. David Noyes will provide an update.
- Request for Holtec to schedule someone to attend a future meeting who can provide the financial details rather than David Noyes having to answer questions.
- Request for MassDEP Speaker (status of AGO review; Holtec's environmental plan)
- Treatment Process for water vs. what is being released from the stack.
- Dry Cask and Spent Fuel Storage Integrity; request for Holtec to provide experts on subject matter due to unanswered questions. Mary Lampert suggests adding interim storage topic. Mary Lampert makes motion. Dr. Barry Potvin seconds the motion. David Noyes suggests this be a future discussion topic, possibly a year out (9 favor, 2 opposed, 4 abstentions). This will not be added to a future agenda item at this time.
- Voting Structure
- Clapp Report; DPH data and conclusions of independent review. Mary Lampert will be able to provide materials to discuss.
- Jack Priest makes a comment that state representatives will abstain from the vote on future agenda topics at this meeting. The state panel members would like to have an internal discussion before voting on any of these topics. James Lampert suggests that the panel give the state members more time and postpone the votes until the next meeting. James Lampert makes a motion to suspend voting on agenda topics and revisit a version of the dry cask topic until the next meeting. Jack Priest seconds the motion (unanimous vote)

### **OPEN MEETING LAW CERTIFICATION**

- Kevin Canty will disseminate the education materials from the AG's office to the NDCAP panel members. He requests that the certification form be submitted before or at the next meeting. He also requests that reply all not be used when corresponding via email.

### **ADJOURNMENT**

- James Lampert makes motion to adjourn. Mary Gatslick seconds the motion.