

## Attachment B – General Questions to IWG

This attachment relates to Agenda Item No.4.

A. The following questions were submitted in March by Chris Nord, Amesbury, MA, submitted in March. In both March and August I sent emails asking they be answered.

1) [for: Jack Priest, Mass. DPH; David Noyes, Holtec] Apparently, there is Low-Level radioactive waste buried on-site at the Pilgrim reactor. Does the State of Massachusetts know where the waste is buried, and how much there is? Is Holtec going to be responsible for its removal and cleanup?

IWG Answer: Given that the site was used as a nuclear plant, it is reasonable to assume that low-level radioactive waste is present on the site. As with other radioactive and non-radioactive contaminants, site characterization and cleanup will be handled under the MCP, subject to the requirements of the Settlement Agreement.

2) [for: Seth Pickering, Mass. DEP] According to former owner Entergy experts Dr. Kevin O’Kula and Dr. Steven Hanna, approximately 60% of the radioactive water vapor from Pilgrim will fall back into the ocean off the coast of Massachusetts. Taking into account the hundreds of thousands of gallons of water already sent skyward through forced evaporation, this seems to violate the Ocean Sanctuaries Act—which the State of Massachusetts has vowed to enforce. Why is there no enforcement?

IWG Answer: This question relates to legal and enforcement determinations, and we cannot comment on these matters.

3) [for: Seth Pickering, David Noyes] According to Marco Kalt0fen, Ph.D. of Boston Chemical Data Corp., Holtec’s forced evaporation of all the radioactive water at Pilgrim will create a concentration of radionuclides on-site one million times that found in Massachusetts coastal waters. What safeguards are in place from the State of Massachusetts or the NRC, to protect our regional environment from these toxins; and what is Holtec’s plan for the proper final handling of this incredibly dangerous residual waste?

IWG Answer: As the state has reported, MassDEP reviewed Holtec’s “potential to emit” air contaminants from evaporation of water at the facility and determined such evaporation activity does not require an air permit. In its July 19, 2024 response, MassDEP indicated that “[i]n 2023, radioactive particulate and tritium releases to the air from Pilgrim Station were well below the NRC standards as published in the Pilgrim Nuclear Power Station 2023 Annual Radiological Environment Operating Report submitted to the NRC.” Further inquiries about this topic should be directed to the NRC, which oversees compliance with the applicable standards.

4) [for: Jack Priest, Seth Pickering] In August, 2023, and February 2024, radiation monitors at the Pilgrim site failed their calibration tests. If the State of Massachusetts and Holtec are indeed interested in assuring the residents near the Pilgrim site of their safety, how were these radiation monitors allowed to fail two calibration tests in a row? Were other radiation

monitors operating at the time that were functioning properly; and have these failed monitors been either restored to working order, or replaced?

IWG Answer: this question relates to incidents that were reported to NRC, which concluded that Pilgrim's monitoring of radiation released through the vent was not significantly impacted by these incidents. Any further or additional questions on this topic should be directed to Holtec or NRC.

B. On August 9, 2024, Mr. Lampert sent Seth Pickering and Gerard Martin the following email:

Gerard and Seth:

In the late 1960's and early 1970's when Pilgrim was constructed, it was common to use asbestos in concrete to provide strength, durability and flame resistance.

Have the concrete structures, particularly the containment and buildings (including foundations ), been tested for asbestos?

If so, what were the results? If not, when will they be?

Has anyone looked at the building plans and specifications to see what concrete mixes were used?

Jim

See below responses (already attached to agenda)

Mr. Pickering's August 20, 2024 response was:

Good Afternoon Jim,

Here is a link to MassDEP's Asbestos Information and Resource Guide online: [MASSACHUSETTS](#). All built structures in Massachusetts, including residential, commercial, and institutional buildings, are subject to MassDEP's asbestos regulation at 310 CMR 7.15: [download \(mass.gov\)](#).

In response to your questions:

1. Question: Have the concrete structures, particularly the containment and buildings (including foundations ), been tested for asbestos? Answer: Not that I'm aware of. The containment building and the turbine building have not been scheduled for demolition yet.
2. Question: If so, what were the results? Answer: Not tested to date, no results.
3. Question: If not, when will they be? Answer: If applicable to 7.15, concrete will be tested in accordance with that regulation for asbestos content. Except for the owner of an Owner-Occupied, Single-Family Residence who performs asbestos abatement activities at the owner's residence involving solely non-friable asbestos containing material (ACM), the owner/operator of a facility or facility component

that contains suspect ACM shall, prior to conducting any demolition or renovation, employ or engage an asbestos inspector to thoroughly inspect the area to be worked on. Therefore, owners and/or operators (e.g., building owners, renovation, and demolition contractors, plumbing and heating contractors, flooring contractors, etc.) need to determine all asbestos containing materials (both non-friable and friable) that are present at the site and whether those materials will be impacted by the proposed work prior to conducting any renovation or demolition activity.

4. Question: Has anyone looked at the building plans and specifications to see what concrete mixes were used? Answer : No, not at MassDEP.

### **Attachment C – Decommissioning Work Accomplished and Planned**

Sections 1 and 2:

IWG Answer: As we have reported, the Attorney General’s Office is working to finalize the state’s response to Holtec’s site assessment work plan, so we cannot comment while these legal deliberations are ongoing. However, as we have stated, cleanup of the site is proceeding under the Massachusetts Contingency Plan (MCP, or M.G.L. c. 21E), which is an iterative process with deadlines for each phase established in the MCP. Many of these questions related to demolition activity that will not occur for many years.