

An October 1<sup>st</sup> update on the status of the nuclear decommissioning of the former Entergy Plant now owned by Holtec International.

Joseph Coughlin, a PlymouthFirst member has been an active member of the Mass Nuclear Decommissioning Citizens Advisory Panel for many years [NDCAP ]

On Saturday, September 28, 2019, 10:14:16 AM EDT, Joseph Coughlin <hjc12@verizon.net> wrote:

The NRC could have avoided all of this current controversy by addressing the two main concerns of the Commonwealth: 1. What would happen if the Decommissioning Trust Fund (DTF) for the Pilgrim Nuclear Power Station (PNPS) proves insufficient to complete the decommissioning meeting all NRC decommissioning requirements and 2. Requiring an onsite environmental site review. Their moving forward on approving the license transfers without addressing these issues has created an unnecessary political and strategic error. This decision means that the NRC is convinced that all of their decommissioning requirements can be met by the new licensee, Holtec for the amount in the DTF, which is currently a little over \$1 billion. Their decision was based upon their review of the Post Shutdown Decommissioning Activities Report (PSDAR) which is required by the NRC of potential licensees, and is available on the NRC's web site. Unfortunately not all of it is however public, as parts of it are considered proprietary to protect the business interests of the licensee (Holtec) from their competitors, which is not an unusual practice. The difficulty that the NRC has created is now they have to figure out how to publically address the legitimate concerns of the Commonwealth and others, while protecting the proprietary interests of the licensee, which they made more difficult by their not addressing these concerns prior to their final approval of the license transfer from Entergy to Holtec in August.

A current environmental site assessment is important to understand what the contamination issues are that will need to be cleaned up and therefore the estimated costs of doing so. These costs will be a part of the overall costs of decommissioning and had to be included as part of the cost estimates submitted under the PSDAR and estimated by the licensee to be well within the funds available in the DTF.

It is my view that in the end all of this will eventually be addressed, although possibly not to the satisfaction of some, and the decommissioning process will move on doing what it is supposed to do complying with all NRC requirements and possibly more as a result of the current ongoing negotiations.

Holtec and its new subsidiary CDI are in the business of decommissioning nuclear power systems. There are about ten such systems across the country that will be filing with the NRC to close within the next ten years. Holtec wants to be the decommissioning licensee for as many of those that they can get, which is simply normal business. They do have competition in this arena as there are a couple of other companies in this business as competitors. As such, much is riding on Holtec's successful completion of the decommissioning of the PNPS. The NRC will be watching Holtec's decommissioning of the PNPS to see that it meets all of the NRC's requirements. Failure to do so may impact the NRC's approval of any future license transfers for the future decommissioning of the other nuclear power stations that will be closing in the future, as mentioned. If any major problems arise that significantly increase the estimated decommissioning cost estimates as contained in the proprietary part of Holtec's PSDAR, the NRC has repeatedly said they will hold the licensee, Holtec, accountable for such costs. The question has always been, and still is, how will they do that under the corporate structure has set up by Holtec with several "subsidiaries" that are LLC's, with the main one for the PNPS decommissioning which has only the DTF funds as its only source of decommissioning assets. So if those assets prove insufficient, how can the Holtec "corporate veil" be pierced to access other assets to be used to pay for any such additional costs that may arise? This is still an unanswered question by the NRC, which the Mass Nuclear Decommissioning Citizens Advisory Panel (NDCAP), of which I am a member, the Commonwealth and others have repeatedly asked of the NRC, but to date have not had a detailed and satisfactory response.

Stay tuned, "it ain't over till it's over".

Joe Coughlin