

September 16, 2022

**Jeffrey T. Blake**  
jblake@k-plaw.com

FEDERAL EXPRESS

Holtec Decommissioning International, LLC  
Krishna P. Singh Technology Campus  
1 Holtec Blvd.  
Camden, NJ 08104

Holtec Pilgrim, LLC  
1 Holtec Blvd.  
Camden, NJ 08104

RE: Holtec International – Decommissioning Pilgrim Station (Plymouth, Massachusetts)

To Whom It May Concern:

I write on behalf of the chief elected officials of the Town of Duxbury, Massachusetts to express our grave concerns regarding Holtec’s proposal to discharge radioactive materials into Plymouth Bay. As a community that is located directly next to Plymouth Bay, the Town of Duxbury, and its businesses and citizens, are at risk of devastating environmental, public health, and economic impacts should Holtec proceed with its plan to discharge radioactive materials into Plymouth Bay, Cape Cod Bay and surrounding waters.

As you know, the Commonwealth of Massachusetts and Holtec entered into a Settlement Agreement on June 16, 2020 (the “Settlement Agreement”), to resolve issues surrounding the transfer of control of the Pilgrim Nuclear Power Station (“Pilgrim”) and spent nuclear fuel management at the site.<sup>1</sup> To that end, the Settlement Agreement provided critical protections, including compliance measures stricter than federal requirements, to ensure Holtec conducts spent nuclear fuel management activities safely.<sup>2</sup>

Specifically, Section III.10.(l) of the Settlement Agreement requires Holtec to comply with “all applicable environmental and human-health based standards and regulations of the Commonwealth . . . .”<sup>3</sup> This would include but not be limited to, G.L. c. 270, § 16,<sup>4</sup> G.L. c. 22E, § 5,<sup>5</sup> and the Ocean Sanctuary Act (G.L. c. 131A) and 301 CMR 27.00, et. seq.

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<sup>1</sup> “AG Healey, Baker-Polito Administration Reach Agreement With Holtec Over Sale of Pilgrim Nuclear Power Plant.” (<https://www.mass.gov/news/ag-healey-baker-polito-administration-reach-agreement-with-holtec-over-sale-of-pilgrim-nuclear-power-plant>). Accessed August 10, 2022.

<sup>2</sup> *Id.*

<sup>3</sup> “Settlement Agreement Between the Commonwealth of Massachusetts and Holtec Pilgrim, LLC and Holtec Decommissioning International, LLC Regarding the Pilgrim Nuclear Power Station, Plymouth Massachusetts.” (<https://www.mass.gov/doc/pilgrim-settlement-agreement/download>). Accessed August 24, 2022.

<sup>4</sup> “Disposal of rubbish, etc. on or near highways and coastal or inland waters; penalties; enforcement; park rangers.”

<sup>5</sup> The Massachusetts Oil and Hazardous Material Release Prevention and Response Act.

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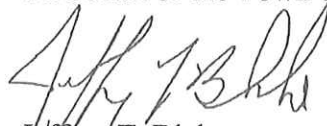
However, over the past year, local communities and public officials have received conflicting information regarding nuclear fuel management activities at Pilgrim.<sup>6</sup> Specifically, and of greatest concern, is the potential for the discharge of radioactive materials into Plymouth and Cape Cod Bay.

To that end, we respectfully request that you confirm in writing your plans relating to radioactive waste disposal at the Pilgrim Station site.

To the extent that Holtec indicates it will discharge radioactive materials into Plymouth Bay, Cape Cod Bay or the surrounding waters, please be advised that the Town of Duxbury is prepared to bring any and all necessary legal proceedings against Holtec to protect the citizens of our Town and the Commonwealth.

We eagerly await your response.

Very truly yours,  
On behalf of the Town of Duxbury, Massachusetts



Jeffrey T. Blake

JTB/JGM/lmk  
cc: Town Manager

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<sup>6</sup> "Issues Facing Communities with Decommissioning Nuclear Plants." United States Senate Committee on Environment and Public Works, Subcommittee on Clean Air, Climate, and Nuclear Safety. Field Hearing at Plymouth Town Hall, Plymouth, Massachusetts. May 6, 2022. ([https://www.epw.senate.gov/public/\\_cache/files/7/d/7df3f36e-4441-4fbb-b4b7-17c486e1b8b0/E79494CD3D5B107B30617B24FFF09EF6.field-spw-05062022.pdf](https://www.epw.senate.gov/public/_cache/files/7/d/7df3f36e-4441-4fbb-b4b7-17c486e1b8b0/E79494CD3D5B107B30617B24FFF09EF6.field-spw-05062022.pdf).) Accessed August 24, 2022.