

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

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To: Leeds, NRR

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Bowman, OEDO

SUBJECT: Town of Plymouth support for 10/18/11 approval of actions to implement recommendations in the near-team task force report to be taken without delay, and 10/19/11 approval of proposed charter for longer-term review of Fukushima lessons learned

ACTION: Appropriate

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October 21, 2011

Chairman Gregory B. Jaczko
Commissioner Kristine L. Svinicki
Commissioner George Apostolakis
Commissioner William D. Magwood, IV
Commissioner William C. Ostendorff
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Town of Plymouth Support for October 18, 2011 Approval of Actions to Implement Recommendations in The Near-Term Task Force Report To Be Taken Without Delay, and October 19, 2011 Approval of Proposed Charter for Longer-Term Review of Fukushima Lessons Learned

Dear Chairman Jaczko and Commissioners:

On October 18, 2011, the Nuclear Regulatory Commission ("NRC" or "Commission") approved the NRC Staff's September 9, 2011 proposed actions to implement "without delay" the recommendations of the Fukushima Near Term Task Force ("NTTF") set forth in the July 12, 2011 *Near-Term Report and Recommendations for Agency Actions Following the Events in Japan* ("NTTF Report"). In a separate memo dated October 19, 2011, the Commission approved the NRC Staff's proposed charter for the longer-term review of lessons learned from the March 11, 2011 Japanese earthquake and tsunami ("Fukushima Lessons Learned"). The Town of Plymouth, Plymouth County, Massachusetts ("Town of Plymouth"), hereby provides its support for the Commission's approval of (1) the NRC Staff's proposed actions to implement the NTTF Report's recommendations and (2) the NRC Staff's proposed charter for longer-term review of Fukushima Lessons Learned.

The July 12, 2011 NTTF Report proposed, among others, recommendations for enhancing the mitigation capability of reactors in the United States with regard to prolonged loss of power, containment overpressure protection, combustible gas control, spent fuel pool safety, and onsite emergency actions, and a proposal that boiling water reactors ("BWRs") with designs similar to the Fukushima reactors be required to install certain containment vents. In its October 18, 2011 approval of the NRC Staff's proposed actions to implement the recommendations ("Approval"), the Commission indicated that the agency should complete and implement the approved recommendations by 2016.¹

In 2006, Entergy Nuclear Operations, Inc. ("Entergy") submitted to the Commission an application for the renewal of its license to operate the Pilgrim Nuclear Power Station ("Pilgrim"), which is located on the western shore of Cape Cod Bay in the Town of Plymouth. Pilgrim's facility includes a General Electric Mark I BWR of the same type as the reactor at the Fukushima Daiichi facility.

¹ The Commission has not completed its vote on the October 3, 2011 NRC Staff paper prioritizing the proposed actions.



The Town of Plymouth is in direct proximity to the effects of any major incident that might occur at the Pilgrim facility, and could be directly impacted by an accident's attendant detrimental effects on residents' health, safety, property, environment, on tourism, and on the local economy. In October 2006, the Atomic Safety and Licensing Board ("Board") ruled that, as an "interested local governmental body" in accordance with 10 C.F.R. § 2.315(c), the Town of Plymouth was permitted to participate in the hearing granted by the Board regarding the application for the renewal of the Pilgrim operating license. In November 2006, the Town of Plymouth formally notified the Commission and the Board of the admissible contentions in which it would participate in the relicensing hearing, which included contentions regarding the adequacy of Entergy's proposed aging management program and Severe Accident Mitigation Alternatives ("SAMA") analysis for Pilgrim. Since that time, the Town of Plymouth has been actively engaged in the Pilgrim relicensing process.

The Town of Plymouth also has followed closely the Commission's response to the events at the Fukushima Daiichi facility with an acute and specific awareness of the need to guard against a similar accident at Pilgrim. Town of Plymouth vigorously supports active reactor oversight and the Commission's ongoing safety initiatives. In contrast to those who assert that ongoing relicensing proceedings cannot continue until a longer-term and comprehensive review of the events at Fukushima Daiichi is complete, the Town of Plymouth believes that the NTF recommendations and the longer-term review of Fukushima Lessons Learned are not necessarily at odds with – and thus need not necessarily halt – the ongoing Pilgrim relicensing process. However, safety, prevention of severe accidents, and transparent, engaged processes by the NRC, Entergy, and the community are the Town of Plymouth's top priorities with respect to Pilgrim, and the Town of Plymouth will continue to support strongly the Commission initiatives that reflect similar concerns regarding commitment to reactor oversight and actions in response to lessons learned by the Commission post-Fukushima, taking into account other incidents at domestic nuclear generation facilities.

Sincerely



Mr. William Hallisey
Chairman
Board of Selectmen, on behalf of the
Town of Plymouth

cc: Sheila S. Hollis

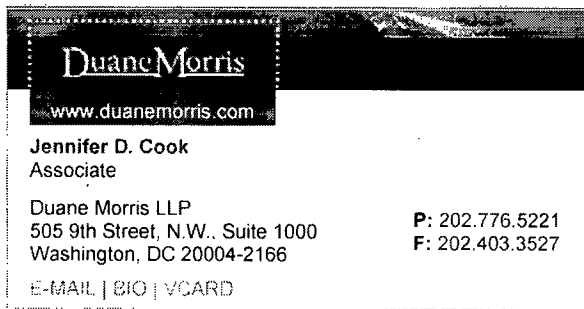
Champ, Billie

From: Cook, Jennifer D. [JDCook@duanemorris.com]
Sent: Tuesday, October 25, 2011 4:27 PM
To: NRCExecSec Resource
Subject: Town of Plymouth Comments in Support of Recent Commission Approvals
Attachments: 2011_10_25_11_47_12.pdf

Attached for submittal to Chairman Jaczko and the Commissioners please find comments of the Town of Plymouth, Massachusetts in support of the Commission's October 18 and 19 approvals of the NRC Staff's proposed actions to implement the NTF Report's recommendations and the NRC Staff's proposed charter for longer-term review of Fukushima Lessons Learned.

Please let us know if you have any trouble accessing this submission.
Thank you.

Jennifer Cook



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