

CHAIRMAN Resource

From: Pine duBois <pine@jonesriver.org>
Sent: Thursday, November 07, 2013 8:40 AM
To: CHAIRMAN Resource
Cc: Niedzielski-Eichner, Phillip; Congressman Bill Keating
Subject: Pilgrim visit

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Dear Chair MacFarlane,

With apologies for this somewhat last minute email.....The purpose of this is to implore you--if it is not already your intention, to be sure to examine the site location OUTSIDE on Cape Cod Bay. We are concerned that the facility owner is portraying an unrealistic, dangerous, confusing and, possibly, an uneducated assessment of the vulnerability of the Pilgrim site to FLOODING and other elemental dangers that exist due to the facility's proximity to the coast, exposure to the Northeast, and extremely low elevation relative to storm surge and wave action.

I queried you during your visit last March 3 at Harvard regarding the flooding/ sea level rise vulnerabilities of Pilgrim station, and you assured me that the NRC was requiring the nuclear industry to evaluate their facility's peculiarities. I did not realize at the time that Entergy/Pilgrim had submitted a response letter dated February 28. Frankly I am not just dismayed, but horrified at Entergy's claims relative to its "dry site" and lack of need for a "beyond design basis" event occurring there as a result of flooding.....Perhaps the definitions need clarification.

From Entergy's letter p 1 and 2 of the assessment

External Flood Hazard Assessment:

The PNPS Site general elevation of 23 ft above mean sea level (msl) places it in the category of "dry sites" according to NEI 12-06, Section 6.2.1, based on the following design basis flood level from FSAR Section 2.4.4.2, "Tide Levels".

Extreme Storm Tide = + 13.5 ft msl

Extreme Low Tide = -10.1 ft msl

The datum relationship at the site is that msl is 4.8 ft above mean low water (mlw) level. It has been calculated that the 100 year storm could produce a still water level of + 15.8 ft mlw.

This is a combination of storm surge combined with astronomical high tide. The hydrometeorological section of the U.S. Weather Bureau has established a standard northeaster for New England. Using this storm, the peak storm surge, having a return frequency of 1,000 years, is 6.6 ft.

The concurrence of peak storm surge with an astronomical high tide of (+)11.7 ft mlw would give an extreme storm tide level of (+)18.3 ft mlw, such that +18.3 ft mlw = +13.5 ft msl, with a probability of occurrence of once every 4,000 yr. Additionally the climatological precipitation quantities in eastern Massachusetts show that the region does not have a wet or a dry season. Monthly averages vary from about 3 in to 4 1/2 inches at Plymouth. The maximum 24 hour rainfall is 6.88 inches from FSAR table 2.3-16. All Class I structures are designed for flood protection in the event of a maximum probable flood (Reference 2).

Therefore, because PNPS is built above the design basis flood level and is considered a "dry" site by the NEI 12-06, Section 6.2.1 guidance, PNPS is not required to evaluate flood induced challenges

I request that the NRC demand information from the operator to provide the name and license info for the coastal geologist that is responsible for this statement in the letter/assessment. I also request that you require the operator to provide a sketch graph of the site with the elevations graphed in order to overcome their propensity to mix and match datum thereby thoroughly confusing the whole world. In my opinion their statements are junk and can lead to a disastrous outcome in the near future--especially as Pilgrim continues to develop the site to store spent nuclear fuel in outside containment, adjacent to the coast with little freeboard above sea level.

You said in March--that Fukushima taught us lessons--"we did not think this could happen"/ Pilgrim is a duplicate model for this thinking with dismissive language such as in their February letter when it is abundantly apparent that in fact Pilgrim is excessively vulnerable to sea level rise, nor' easters and hurricane force storms.

In February and March this year we had nor' easters that shut down Pilgrim for various reasons. Below is a link to a video of a site that is 2 miles to the northwest along the coast--Bert's is about eight feet lower than the Pilgrim. Perhaps when you are there--you can ask to see pictures of the Pilgrim site from the February storms of their impact on the facilityas well as the February storm of 1978.

Here is the video is of the Bert's restaurant that got pounded in March--Bert's is on Warren Av--you can pass it going to Pilgrim <http://www.youtube.com/watch?v=NZV2vPVEAqI>

Please ask Pilgrim for a scientifically justified assessment of their vulnerability to coastal storms, surge and flooding. Sea level has come up a foot since we purchased property on the Jones River estuary in 2003. Pilgrim is much more vulnerable than our facility--and we are taking measures to address SLR. We are a boatyard--they are a hazardous facility. Please help protect this region from their institutional denial.

Thank you for your time and consideration.

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