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Entergy Nuclear Operations, Inc., Vermont Yankee Nuclear Power Station Post-Shutdown Decommissioning Activities Report

Comment On: NRC-2015-0004-0001

Entergy Nuclear Operations, Inc., Vermont Yankee Nuclear Power Station Post-Shutdown Decommissioning Activities Report

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General Comment

These are my concerns:

Site Assessment Study Update: Entergy released the site assessment 10.17.14.

I would have preferred an independent assessment. I have to trust they are not hiding anything (tritium or other leaks, toxic construction debris dumps, etc.).

PSDAR: Post-Shut Down Decommissioning Activities Report.

(1) Whats the rush? PSDAR is required by the NRC within 2 years after shut down. Entergy submitted a draft with the Site Assessment Plan in October two months before shut down. The State Dept. of Public Service wants comments by November 25. Entergy will take comments up until the next meeting of the Citizen Advisory Panel on December 18. Are they rushing it through to get their hands on the decommissioning trust fund quickly? Or is the company hiding something and they do not want the State, citizens or the NRC to look at the report carefully? Or both?

(2) The NRC will hold its own comment period for 60-90 days. The PSDAR is simply checked off a list of decommissioning requirements by the NRC. The NRC does not approve or disapprove the report. It trusts the owners.

Emergency planning in the evacuation zone: Entergy wants to stop paying for it in April 2016 even with tons of

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radioactive fuel in the fuel pools, and while the dangerous work of moving the fuel from the pool into dry cask storage takes place.

We need to get the best dry casks available for the long term for the 910 tons of waste in the fuel pool and reactor core. Two others reactors are also looking at dry cask storage, San Onofre in California, and Pilgrim in Mass. They determined that a superior system is used in Germany, France, and Japan. See SanOnofreSafety.org Reports: Dry Cask Storage Issues, and Top 10 Reasons to Buy Thick Casks; and a presentation to the NRCs Waste Conference 11.19.14 (YouTube video) comparing the thin canisters were stuck with to German version.

PSB approval for new dry cask storage. Entergy needs a Certificate of Public Good from the Public Service Board. Yankee has it in the flood plain. (Reformer 07.02.14). This is dangerous.

Inadequacy of the decommissioning fund. Entergy will hold off beginning decommissioning until funds are adequate a period of SafStor until 2054. NRC doesnt make them front corporate money & repay themselves from the decomm fund once its adequate. (Decomm. VY & Its Waste Report to Legislature by Fairewinds 01.2011)

Water temperature: The Connecticut River Watershed Council is still quite concerned about impact of thermal pollution on fish and other aquatic biota between now and closure.

Texas/VT Compact: Vermont & Texas agreed on a site in Texas to store our two states low level radioactive waste. Since that time, the Compact has changed. The Compact has welcomed much more waste from other states and has enlarged the waste dump beyond its original scope, nullifying Vermonts original careful advocacy for environmental justice and ecological safety. It is now closer to aquifers, there is water in monitoring wells, and 3 employees have quit (waste must be kept dry) as Texas goes full speed ahead on accepting waste. Transportation of low level waste to Texas during decommissioning. For security purposes where & when trucks & trains travel is not public. How safe will our neighborhoods be, especially in the small roads in Vernon, Northfield, and Brattleboro, and on railroads that are stressed by the increase of trains carrying natural gas and oil from Canada?

Worker health and safety, which goes beyond radiation exposure; nuclear facilities host multiple toxic and hazardous materials. Worker health has been lax at some past decommissioning events. The IAEA held an international workshop on worker safety radiation protection during decommissioning; only 1 US firm participated. (RSCS 06.2014)

Be vigilant in watching Entergy to make sure it does not continue its pattern of hiding mishaps at the reactor. Deferring maintenance to cut costs.

Respectfully,
Thomas Matsuda