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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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## Submitter Information

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## General Comment

I attended the NRC Vermont Yankee Post Shutdown Decommissioning Activities Report Public Meeting on Feb. 19, 2015. Many aspects of what I saw and heard there were quite disturbing. For instance,

1. The NRC seems to have been disemboweled by collusion between the industry, our elected officials, and the agency itself. Although the NRC representatives that were present at the meeting seemed knowledgeable, earnest, forthright, and helpful, they appear to be hogtied by old rules that severely limit the agency's authority. An example of this is that each NRC employee on the panel pointedly repeated the mantra that "It is not the duty of the NRC to approve or disapprove Entergy's decommissioning plan". It is, perhaps, not too much of an exaggeration to say that the agency has been reduced to a toothless, rubber-stamping bystander.
2. Subsequently, the archived NRC video webcast of the meeting was not made available to the public until the day before the deadline for public comments to the agency regarding the decommissioning report, despite repeated inquiries from multiple parties.
3. Not a single elected state or federal representative or senator from Vermont, Massachusetts, or New Hampshire attended the meeting, although Bernie Sanders sent an underling. We, the citizens, were forced to represent ourselves at this meeting, with none of the vaunted "leadership" that we are always hearing about. The costs and risks of decommissioning the plant and storing its spent fuel waste are a "can of worms" that politicians apparently do not want to even acknowledge. For its part, Entergy's strategy is to simply stall for as long as legally possible - that is, 60 years, thanks to lax NRC rules - and let our grandchildren, who will then be weary and aging taxpayers, pay for the problems then. Our politicians apparently agree with this tactic.
4. It is good that Entergy is transferring the spent fuel to dry cask storage, which is less hazardous than continuing to store the spent fuel in the upper-story water pool. It is worth noting, however, that Entergy is suing the Federal Government for \$143 M to pay for this work. This is because the federal government agreed in 1987 to take care of the problem of long-term waste storage (relieving the industry of any direct cost for that) and

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then reneged. Of course, this really means that Entergy is taking \$143 M from us taxpayers to pay for this work. 5. Since Entergy purchased the plant in 2002, it has not contributed a penny to the decommissioning trust fund. Surely, decommissioning costs could have been anticipated? Surely, the parent company is liable for timely cleanup?

6. Furthermore, costs now estimated at \$1.2 B in 2015 dollars have been repeatedly reported in local media, but without that specification of "2015 dollars", which naturally leads the public to believe that only \$1.2 B will be needed in 2065, when, in fact, due to inflation, it is more likely that \$5.0 B to \$20.0 B in 2065 dollars will be needed.

7. Even further, it is alarming to hear that Entergy officials are "hand-waving" regarding actual costs, which they say will not be discovered until work starts, and to hear them saying that lawsuits are likely to be filed at that time, to force cost-sharing with former owners.

8. In the present plan, the torus will continue to hold large quantities of contaminated water for many decades, which is subject to leakage.

9. Regarding dry cask storage, after examining a report that was mandated by the Nuclear Waste Policy Act of 1982 entitled "Evaluation of the Technical Basis for Extended Dry Storage and Transportation of Used Nuclear Fuel", by the United States Nuclear Waste Technical Review Board (see copy at [http://www.nwtrb.gov/reports/eds\\_rpt.pdf](http://www.nwtrb.gov/reports/eds_rpt.pdf)), I am not reassured. There are presently 13 casks on an open concrete pad at Vermont Yankee; a total of 58 casks will eventually live there. These casks were originally designed and qualified for temporary use and a 20 year life. The Nevada Yucca Mountain centralized federal repository for spent fuel has now closed, so the spent fuel will live in Vernon indefinitely; as a result, the NRC has graciously extended the dry cask license to 60 years, with no apparent justification. The report cited above lists many technical concerns with dry cask storage.

I hope that NRC personnel will lobby our politicians to acquire more regulatory strength, and that the NRC will cease work on any new plants. It is clear that we have enough nuclear waste problems already - we don't need any new ones.

Sincerely,

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