

## U.S. Nuclear Regulatory Commission Public Meeting Summary

November 15, 2017

**Title:** Notice of Category 3 Public Meeting on the “Regulatory Improvements for Power Reactors Transitioning to Decommissioning” Rulemaking

**Meeting Identifier:** 20170581

**Date of Meeting:** May 8-10, 2017

**Location:** Commission Hearing Room

**Type of Meeting:** Category 3

**Purpose of the Meeting:** The purpose of this meeting was to discuss the draft regulatory basis (RB) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17047A413) and associated preliminary draft regulatory analysis (RA) (ADAMS Accession No. ML16271A511) for the rulemaking on regulatory improvements for power reactors transitioning to decommissioning. The U.S. Nuclear Regulatory Commission (NRC) staff published the draft RB for comment on March 15, 2017 (82 FR 13778), and the preliminary draft RA for comment on May 9, 2017 (82 FR 21481). Public comments for both documents were due June 13, 2017. Forty public comment submissions were made, including over 1000 comments. The NRC staff binned the comments and considered that input in the finalization of the RB. The NRC staff’s goal is to issue the RB in mid-November 2017.

Specifically, the objective of this meeting was to enhance external stakeholders’ understanding of these two documents to inform the development of comment submissions on the draft RB and preliminary draft RA. During this meeting, the NRC staff provided presentations on the draft RB and the preliminary draft RA. Members of the public were encouraged to ask questions and provide feedback during this meeting. However, the NRC staff did not accept formal comments on the draft RB or the preliminary draft RA at this meeting. The NRC staff reiterated at the meeting that all comments must be submitted in writing, in accordance with the instructions listed in the *Federal Register* notice for the draft regulatory basis.

**General Details:** The meeting was attended by a number of individuals, as highlighted at the end of this meeting summary, including industry representatives, members of the public, State and local government representatives, and NRC staff. Individuals participated through audio teleconferencing, webcast, and in person.

**Summary of Presentations:** The NRC staff presented a high-level overview of the draft regulatory basis published March 15, 2017 (82 FR 13778) and available under ADAMS Accession No. ML17047A413. The NRC staff also presented a high-level overview of the preliminary draft regulatory analysis published May 9, 2017 (82 FR 21481), and available under Accession No. ML16271A511. Both documents are available on [www.regulations.gov](http://www.regulations.gov) under the Docket ID NRC-2015-0070 and are available for public comment through June 13, 2017. Following each of the staff’s presentations, public participants were provided an opportunity to ask questions and engage in open discussion with the NRC staff.

The NRC staff opened the discussion by indicating that the decommissioning rulemaking is one of the highest priority rulemakings at the agency and that the purpose of the draft RB document

is to capture the NRC staff's justification and scope of the rulemaking. The primary goals for the rulemaking are to make the decommissioning process more efficient, reduce the need for licensees to request exemptions from regulations, and address other issues that the staff deems relevant. The draft RB builds upon the Advance Notice of Proposed Rulemaking (ANPR) that was issued for public comment in November of 2015. The 162 public comment submissions on the ANPR informed the NRC staff's development of the draft RB. In turn, the comments received on the draft RB informed the formulation of the final RB that the NRC expects to issue in mid-November 2017. The slide presentations for the various topical areas highlighting key points and recommendations in the draft RB provide significant detail; therefore, only stakeholder feedback and questions are captured in this meeting summary.

The meeting slides and handouts are available in the ADAMS packages under Accession Nos. ML17125A004 and ML17131A093. The meeting was also webcasted, and the recording of the meeting can be found at the following site: <https://video.nrc.gov/#searcharchivedwebcasts>. In addition to the material presented in the slides, the major areas of discussion (including the question and answer periods) are summarized below.

### **Public Participation Themes:**

The summary of public participation themes below contains two major sections. The first section contains feedback and questions from the public and is organized in the order of when each topic was presented on each day of the meeting (May 8-10, 2017). For each of the pieces of feedback or questions, the NRC staff encouraged the commenter to submit their comments on the docket. In some cases, additional information was provided by NRC staff at the meeting, which is captured as sub-bullets under the piece of feedback or question. The second section contains feedback and questions that are outside the scope of the rulemaking, for which the NRC staff is providing additional information in this summary.

#### Section 1: Feedback and Questions from the Public

May 8, 2017

#### Appendix H- Current Regulatory Approach

##### *Post-Shutdown Decommissioning Activities Report Review and Approval Process:*

- A representative from Fort Calhoun asked how the changes proposed in the draft RB would affect those plants currently undergoing decommissioning.
  - The NRC staff responded that this is not a retroactive rule.

##### *Options for Decommissioning:*

- A representative from the Nuclear Energy Institute (NEI) asked how items identified in Option 2 (Guidance Development/Enhancement) comport with NRC's mission as a regulatory body. Additionally, NEI questioned why a company's business decisions need to be a part of the regulatory purview?
  - The NRC staff responded that regulatory guides and other guidance documents are developed and issued to assist licensees with implementation of new or revised requirements. The NRC staff further indicated that the draft Regulatory Guides (RG) will be issued for public comment. The NRC staff clarified that the additional text that staff is recommending to include in the RGs regarding post-shutdown decommissioning activities report (PSDAR) submittals captures the same information currently included in the requests for additional information (RAIs) that the NRC staff has issued, as necessary, for PSDAR submittals.

- A representative from Pacific Gas & Electric asked the NRC staff to clarify the timing of the draft RGs.
  - The NRC staff responded that the draft RGs related to implementation of any new or revised requirements in the rulemaking will go out for public comment with the proposed rule next year. The RGs that are not needed for implementation of the rule but are related to decommissioning may be on different schedules than RGs supporting the rulemaking. These schedules will be identified in the near future.
- A representative from the State of Vermont asked if all guidance updates would occur with the proposed rule.
  - The NRC staff responded that only the guidance needed to implement the rulemaking would be published in draft form (for comment) in coordination with the proposed rule.

*Sixty-Year Timeframe for Decommissioning:*

- A representative from Talisman International indicated that there are new techniques since the current decommissioning regulations were developed. He was skeptical of the 1 percent of the decommissioning trust fund (DTF) to be used for miscellaneous expenses and requested the NRC staff to look at the lessons learned, especially with respect to waste volumes and dose and asked NRC to include more detail in the RB.

*Role of Stakeholders in the Decommissioning Process:*

- Industry asked what is driving the update to the RGs for Appendix H.
  - The NRC staff responded that amendments to the RGs could capture best practices for Community Advisory Boards (CABs) and other lessons learned to make the RGs more useful and flexible.
- A member of the public near the San Onofre Nuclear Generating Stations (SONGS) pointed out that their “advisory board” was just a communication avenue with membership chosen by the licensee. She noted that the RGs should include examples of what is working and what is not working with already established CABs.
- A representative from the State of Vermont asked which NUREG was going to be updated to include the information on CABs.
  - The NRC staff responded that NUREG-1757, “Consolidated Decommissioning Guidance” Appendix M, contains that information and does not go into detail on the membership or types of people involved in the CAB.
- A member of the public near SONGS expressed concerns about the decommissioning of that plant and conveyed that he is not satisfied with the community engagement panel, as he does not feel that it’s empowered to take any action. He urged the NRC to look more closely at the worst case for spent fuel fire and was concerned that NRC had allowed disbanding of the fire brigade.
- Another member of the public near SONGS agreed and stated that the CAB for SONGS is ineffective. He pointed to actions he had taken to have Dr. Livingston give a presentation to the CAB concerning the neutralization of U235/U238 and preventing the criticality of spent fuel. The CAB did not offer an invitation to Dr. Livingston, and he feels the NRC should step in and direct the CAB to do so.

*Spent Fuel Management:*

- A representative from Fort Calhoun suggested that consistency is needed with respect to spent fuel mitigation especially for the 2-hour response time for the Station Blackout and Advanced Accident Mitigation spent fuel pool requirements (Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(hh)(2)).

*Part 51 Cleanup:* No questions.

Appendix I: Backfitting

- A member of the public asked what date triggers the backfit rule.
  - The NRC staff responded that currently 10 CFR 50.109 applies during operation and decommissioning.

Appendix D: Drug and Alcohol Testing - No questions.

Appendix K: Fatigue Management

- A member of the nuclear industry pointed out that there appear to be inconsistencies in the handling of the backfit discussions for Appendices D and K.
  - The NRC staff responded that drug and alcohol testing are already being done under Part 73 requirements (for security), while fatigue management is a safety provision.

May 9, 2017

Appendix A: Emergency Preparedness

- A representative from Fort Calhoun (Omaha Public Power District) asked about the time requirement allowed for mitigation actions that was established at two hours. He stated that some facilities may take longer than two hours, and asked if the NRC would allow that. He indicated that for some licensees, additional plant modifications would be needed to address this requirement.
  - The NRC staff replied that the two hour timeframe was based on the NEI 06-12 Revision 3, "B.5.b Phase 2 & 3 Submittal Guideline" (ML092890400), which was submitted by the industry and accepted by the NRC. However, it was not NRC's intention to allow excessive time to pass before response actions were initiated, consistent with the recently Commission-approved exemptions. The NRC staff indicated that it will address this point in the regulatory basis.

Appendix G: Onsite and Offsite Insurance and Indemnity

- A representative from Talisman International asked how the numbers [insurance amounts] were quantitatively determined.
  - The NRC staff responded that the \$71 million associated with the Three Mile Island incident informed the \$100 million for offsite insurance as reflected in recently approved exemptions.
- A member of the public expressed concern about what the term "reasonable assurance" means especially with respect to spent fuel being left onsite long-term. He also stated that the Price-Anderson Act (PAA) figures (amounts) are out of date and that the NRC should focus attention on spent fuel accidents.
- A member of the public asked if reactor licensees could rely on the \$13 billion in financial protection provided by the PAA framework while in a decommissioning status.

- The NRC staff responded that a licensee in a decommissioning status could not rely on the \$13 billion provided by the PAA framework. Under the PAA, and the NRC's implementing regulations, a licensee's offsite financial protection is currently set at approximately \$13 billion while in operation. Neither the PAA nor the NRC's regulations implementing the PAA speak to offsite insurance for reactors in decommissioning. The NRC has granted exemptions to licensees that require the licensee to maintain financial protection of \$100 million once a licensee can prove that a significant decrease in the risk of a nuclear incident at a decommissioning reactor is achieved. Additionally, decommissioning reactors with financial protection of \$100 million may receive government-sponsored indemnity in an amount of up to \$460 million.
- Another member of the public asked if insurance premiums could be paid with decommissioning trust funds.
  - The NRC staff responded yes.

#### Appendix E: Minimum Staffing and Training for Certified Fuel Handlers (CFHs)

- The NRC staff received a question from Talisman International regarding what type of comments the NRC staff would like to see in order to further refine and help focus the staff's rulemaking efforts in this area.
  - The NRC staff responded that no decision has been made with regard to which one of the three recommended options outlined in the draft regulatory basis will be chosen as a path forward. Therefore, the NRC staff is requesting any and all feedback from members of the public regarding the subject technical area, including any matters that may not have been addressed in the draft regulatory basis document, or any additional information that members of the public would like for the NRC staff to consider.
- Another member of the public asked whether the person responsible for transferring spent fuel from the spent fuel pool (SFP) to the independent spent fuel storage installation (ISFSI) (or other, permanent dry storage location) would have to be qualified as a CFH.
  - As part of this rulemaking the NRC staff will consider the qualifications necessary to ensure safe handling of spent fuel during decommissioning. The NRC staff is considering training requirements for CFHs in the rulemaking to ensure licensee staff are prepared to move spent fuel even when it is in dry cask storage.
- Another member of the public questioned if a piece of technical information had been overlooked, namely a report by Julie Cart (dated April 25, 2017) in which the rising sea levels off the coast of California are assessed. She encouraged the NRC to consider this report in the development of the final regulatory basis.

#### Appendix J: Aging Management

- One member of the public pointed out that per the guidance in NUREG-1927, "Standard Review Plan for Renewal of Specific Licenses and Certificates of Compliance for Dry Storage of Spent Nuclear Fuel," NRC inspectors should look for cracks in the casks and that this issue should also be addressed in the aging management guidance considered in this rulemaking.

#### Appendices B: Physical Security

- One public stakeholder pointed out that if Part 37 is applied to decommissioning, the exemptions would need continuous monitoring for an extended period of time and that monitoring should be commensurate with time.

- One member of the public near SONGS expressed concern about the safety and security of security personnel, for instance, how they are protected from fires.
  - The NRC staff responded that in 10 CFR Part 73 there are requirements for redundant systems to provide protection to security personnel.
- Another member of the public expressed concern that neither NRC nor the Department of Energy (DOE) has all of the records pertaining to the spent fuel pool history. She also pointed out that an inventory is a point in time and not an ongoing recordkeeping system.
  - The NRC staff responded that it is our understanding that DOE and/or the licensee maintains records about spent fuel pool inventory. The rulemaking will also consider recordkeeping requirements appropriate to the scope of the rulemaking.

#### Appendix F: Decommissioning Trust Funds

- One member of the public suggested the word “immediate” be added to the correction of shortfall.
  - The NRC staff responded that licensees should discuss shortfalls in the DTF in their biennial reports and not wait for any lags or corrections in the market to remedy this condition.
- Another member of the public asked if it would be this way for all licensees, not just electric utilities.
  - The NRC staff stated that they recognize the difference between these licensees and will work out these details in the rulemaking.
- Another member of the public expressed concern how future relief to use DTF for spent fuel pools and ISFSIs could be assessed.
  - The NRC staff responded that the 3 percent currently allowed for planning purposes wouldn’t change. The recommended change would be that if there were an excess of funds in the DTF beyond what is needed for decommissioning, the licensee could use that money, without seeking an exemption from the regulations.
- Another member of the public expressed concern that performing a site-specific cost estimate would not reduce the regulatory burden and that a lot of staff and industry resources would be used for this action.

Preliminary Draft Regulatory Analysis: No questions.

May 10, 2017

The NRC staff held an optional question and answer session on the morning of May 10, 2017, to discuss any additional questions regarding the draft regulatory basis. Prior to this session, during the first two days of the meeting, the NRC staff had requested that any stakeholder interested in participating in this session and who had specific topics within the scope of the rulemaking to provide those subjects to the NRC staff ahead of the question and answer session. The only subject within the scope of the rulemaking that was provided to the NRC for discussion on May 10, 2017, was DTF.

The NRC staff opened the question and answer session with a few clarifying remarks regarding the DTF information presented in the draft RB. These included the following:

- Regarding lapses in funding for decommissioning (referred to as decommissioning funding shortfalls), the NRC is recommending to clarify its regulations and codify existing

guidance for how licensees can remedy decommissioning funding shortfalls. In addition, the NRC recommends to incorporate expectations for licensees to maintain decommissioning funding assurance at all times. This means that should a licensee realize a decommissioning funding shortfall, the licensee would take appropriate action to remedy this shortfall. Licensees would provide evidence to the NRC as part of the licensee's biennial decommissioning funding reporting requirements that it has done so.

- Regarding financial assurance for decommissioning using a site-specific cost estimate (SSCE), the NRC staff is requesting feedback from stakeholders as to whether (as part of this rulemaking) the NRC should require licensees to obtain and maintain an SSCE in lieu of the NRC minimum formula as the primary means to certify (while in operations) that sufficient funding will be available to decommission the facility (as provided in the SSCE). This option is not currently part of the NRC staff's recommended options but is an alternative covered, in part, in the draft regulatory analysis. Should the SSCE be a consideration for the proposed rule, further cost/benefit and backfit considerations will be explored/addressed.
- Regarding whether spent fuel management planning expenses can be paid from the DTF or considered as part of the 3 percent decommissioning planning funds, the NRC staff explained that under the current regulatory framework, the 3 percent of funds in the DTF can only be used for decommissioning planning purposes (paper studies) and not spent fuel management. In consideration of the NRC staff's recommended changes to the regulations to allow the DTF to be used for spent fuel management expenses, the licensee would first have to demonstrate that the DTF contains sufficient funding for radiological decommissioning. Funds within the DTF would need to be clearly commingled (accounted for) separate and above those funds needed for radiological decommissioning. Once this has been done, those funds in the DTF identified for spent fuel management could be used for spent fuel management planning.

Public stakeholders provided the following questions during this session:

- Isn't separately accounting for spent fuel management already accounted for? Is the NRC staff proposing in the rule to alleviate the need for licensees to get exemptions and that all other requirements stay in place?
- The SSCEs include all potential spent fuel expenses as well as costs for all spent fuel management and site restoration. Regarding spent fuel expenses, has the NRC staff looked at the implication if there is no permanent repository?
  - The NRC staff responded that it hadn't considered the impact of no permanent repository on spent fuel costs, but that DOE entered into a standard contract with licensees delineating a schedule for when the fuel is to be picked up on each site.
- If DOE's schedule doesn't come to fruition, then what regulations are in place to assure licensees are able to manage this situation?
  - The NRC staff responded that licensees must assure sufficient funds remain available to decommission the plant and terminate the license. The NRC has broad authority to engage with Federal Energy Regulatory Commission (FERC) and others if a lapse in funding is realized.
- What is the mechanism for making up shortfalls for merchant plants? Why wouldn't The NRC staff do something in rulemaking, as recommended by the States?
  - The NRC staff would address this on a case-by-case basis.
- A representative from the State of Vermont asked the NRC staff how it addressed their comments on the ANPR, dated March 18, 2016, in the draft RB (Docket NRC-2015-0070).

- The NRC staff committed to review the table of contents of the 100-page comment submittal document and conveyed that the NRC does not have a requirement to address each comment submitted at the regulatory basis stage. The NRC staff committed to reviewing and providing high level discussion as to how the NRC staff considered the comments on the ANPR and draft regulatory basis, possibly via conference call. However, the NRC staff will consider each public comment submitted on the rulemaking docket at the proposed rule stage.
- As additional information, the conference call mentioned in the previous bullet was held on May 30, 2017.
- What are the next steps?
  - The NRC staff referenced the opening remarks slides provided on May 8, 2017 (ADAMS Accession No. ML17125A004). The RB will be completed in the fall of 2017, the proposed rule package will be delivered to the Commission in 2018, and the draft final rule will be delivered to the Commission in fall 2019.
- Regarding the use of initial 3 percent for pre-planning activities, there was a finding in an NRC inspection report for Vermont Yankee, which mentioned ambiguity in a RG on how to plan for spent fuel management.
  - The NRC staff agreed and mentioned that it plans to update guidance in NUREG-1713, “[Standard Format and Content for Decommissioning Cost Estimates](#),” RG 1.184, “Decommissioning of Nuclear Power Reactors,” and RG 1.202, “Standard Format and Content of Decommissioning Cost Estimates for Nuclear Power Reactors,” to clarify ambiguities as part of this rulemaking.
- What is the proposed requirement for making up a shortfall?
  - The NRC staff reiterated opening remarks (provided above). Further, the NRC staff is recommending a 3-year reporting cycle in lieu of 2-year reporting requirement.
- Why is the use of DTFs for site restoration not included and why wasn’t this addressed in the draft RB?
  - The NRC staff responded that it has no jurisdiction for site restoration. However, the NRC has granted two exemptions to allow use of DTFs for site restoration-related activities.
- Peter M. Livingston’s paper regarding neutralization of U235/239 should be considered.
  - The NRC staff indicated that this is out of scope of this rulemaking.
- A member of the public indicated that the term “reasonable assurance” is a nebulous term and that the NRC shouldn’t use it.
- A member of the public questioned NRC’s standard of reasonable assurance in ensuring licensees having sufficient funds for decommissioning.
  - The NRC staff responded that 10 CFR 50.75 contain the regulations on DTFs and referenced the five plants that recently decommissioned, which were found to have sufficient DTFs.

As further clarification regarding DTF, Zion (Units 1 & 2), La Crosse, SONGS (Units 2 & 3), Crystal River (Unit 3), and Vermont Yankee have requested exemptions to use DTFs for site restoration.

## Section 2: Feedback and Questions that are Outside the Scope of the Rulemaking

It is not NRC practice to respond to feedback or public comments that are outside the scope of a rulemaking. However, the subject rulemaking is particularly complex and involves numerous technical areas. The meeting on May 8, 2017, was the first opportunity for the public to ask



questions of the NRC staff to understand the scope of this highly complex rulemaking. For that reason, this summary will provide additional information about several topics raised at the meeting even though those topics are outside the scope of the rulemaking.

#### Appendix C Session

- A representative from Fort Calhoun asked if responses to their license amendment request on cyber security would be issued soon.
  - The NRC staff notes that Fort Calhoun submitted a license amendment request to extend the implementation of Cyber Security Plan Milestone 8 from December 31, 2017 to December 28, 2018. Review of this license amendment request is ongoing.

#### Appendix E Session

- Another member of the public asked if the NRC had considered a sunset clause especially during the end of the decommissioning process.
  - The NRC staff responded that the timeframe was outside the scope of this rulemaking.

#### Appendix F Session

- Another member of the public pointed out that the industry is already suing the government for funds and reiterated the point that the NRC should be addressing the neutralization of U235 with new techniques.
  - The NRC staff pointed out that DOE might lose those legal cases and then funds would be given to licensees via slow payments. The NRC staff stated that the U235 issue is outside the scope of this rulemaking.
- A representative from the State of Vermont asked if there are currently requirements to make sure licensees can make up shortfalls to DTFs.
  - The NRC staff responded that shortfalls are addressed on a site-specific basis.

#### Appendix J Session

- Another member of the public expressed concern that inspection capabilities relied upon visual inspections of the canisters and supports more quantitative inspection procedures.
  - The NRC staff notes that current aging management inspections include qualified visual examination to detect areas of corrosion and precursors to stress corrosion cracking. Visual indications of corrosion would be subjected to supplemental examination which may include surface or volumetric examination methods as required. Technologies to conduct visual, surface and volumetric examinations of canisters are currently available, and development of systems for delivery of these technologies to improve in-situ inspections of the canisters within their overpacks is currently underway.
- Another member of the public expressed concern about the spent fuel canisters cracking especially since they do not have a seismic rating for already cracked canisters.
  - The NRC's aging management programs include evaluation of flaws and comparison to acceptance criteria for service limits to determine the acceptability of the component for continued service. The service limits take into account loadings to which the component is subjected, including design-basis accident conditions. Therefore, the NRC's evaluation of a cracked canister (to determine

if it can remain in service) would take into account the design-basis seismic event.

**Action Items/Next Steps:**

The NRC staff will consider public comments on the draft regulatory basis and the preliminary draft regulatory analysis in the development of the final regulatory basis and its associated regulatory analysis. The NRC staff's goal is to issue the regulatory basis in mid-November 2017 and the next update to the regulatory analysis will be issued shortly thereafter.

**Attachment:**

- Meeting agenda - ML17129A618
- Meeting Summary – ML17157B211

**Meeting Participants:**

**May 8, 2017**

<b>Name</b>		<b>Organization</b>
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Meena	Khanna	NRC
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Tim	Reed	NRC
Tracey	LeRoy	Duke Energy
Vince	Williams	NRC
Dan	Barss	NRC
Fred	Schofer	NRC
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Donna	Gilmore	San Onofre Safety
Elizabeth	Gormsen	ICS
Greg	Halnon	First Energy Corp
Gary	Headrick	San Clemente Green
Jerry	Hiatt	The Nuclear Energy Institute
Ace	Hoffman	Citizen
Alexander	Hoppes	Areva
Stephen	Kelley	Balch and Bingham
Richard	Kinard	NRC
Anthony	Leshenski	State of Vermont
Patrick	Mulligan	State of NJ Dept of Environmental Protection
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Jessie	Quintero	NRC
Rick	Reid	Electric Power Research Institute
Thomas	Rielly	Vista 360
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Geri	Shapiro	Senator Kirsten Gillibrand
Neil	Sheehan	NRC
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Robert	Sweeney	IBEX Engineering Services Inc
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Becky	Van Auken	Closed Captioner
Peter	Van der Does	New England Coalition
Michael	Wilt	FEMA
Brian	Wright	New York State Homeland Security

**May 9, 2017**

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Marvin	Lewis	Member of Public
Marni	Magda	Sierra Club
Michael	Montecalvo	NRC
Patrick	Mulligan	NJ EPA
Rounette	Nader	Duke Energy
David	Neff	Exelon Nuclear
Kathy	Nesser	First Energy
Paul	Plante	Maine Yankee
Rick	Reid	Electric Power Research Institute
Mark	Richter	Nuclear Energy Institute
Geri	Shapiro	Senator Gillibrand
Neil	Sheehan	NRC
Robert	Sweeney	IVEX Engineering Services Inc
Nick	Theodore	Balch and Bingham
Clay	Turnbull	New England Coalition
Nanette	Valliere	OCM

**May 10, 2017**

<b>Name</b>		<b>Organization</b>
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Ace	Hoffman	N/A
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Tracey	Leroy	Duke Energy
Anthony	Leshinskie	State of VT
Adam	Levin	AHL Consulting
Marvin	Lewis	Member of Public
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John	Moorehead	Westinghouse
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Paul	Plante	Maine Yankee
Rick	Reid	Electric Power Research Institute
Mark	Richter	Nuclear Energy Institute
Geri	Shapiro	Senator Gillibrand
Carlos	Sisco	Winston & Strawn
Nick	Theodore	Balch Bingham
Andrew	Zach	Energy & Commerce Committee