

RULES AND DIRECTIVES
BRANCH
USNRC

As of: 6/7/17 10:51 AM
Received: June 03, 2017
Status: Pending Post
Tracking No. 1k1-8wre-z8j3
Comments Due: June 23, 2017
Submission Type: Web

PUBLIC SUBMISSION

2017
JUN -7 AM 11:09

RECEIVED

Docket: NRC-2017-0125

Vermont Yankee Nuclear Power Station; Entergy Nuclear Operations, Inc.; Consideration of Approval of Transfer of License and Conforming Amendment

Comment On: NRC-2017-0125-0001

Vermont Yankee Power Station; Energy Nuclear Operations, Inc.; Consideration of Approval of Transfer of License and Conforming Amendment

Document: NRC-2017-0125-DRAFT-0002

Comment on FR Doc # 2017-10655

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5/24/2017
82FR 83845
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General Comment

This is a copy of a public comment submitted to the Vermont Public Service Board under their Docket #8880

Recent articles on NorthStar's bid to take over decommissioning of the Entergy Vermont Yankee site have raised some questions for me. ["Rubble Trouble?", Mike Faher, The Commons, May 10, 2017, p. A3; "New England Coalition wants state to reject part of VY clean-up plan," Mike Faher, The Commons, May 10, 2017, p. A4]

The issue surrounds "rubblization" (a "technique that involves saving time and transportation costs by reducing existing concrete into rubble at its current location rather than hauling it to another location" - Wikipedia)

NorthStar CEO Scott State pointed out that concrete was used as fill at Yankee Rowe and the technique was approved at Connecticut Yankee. On the other hand it was discovered that the procedure was not used at Maine Yankee because it was more costly "to separate out clean from contaminated waste." These facts beg the question of what analysis needs take place to determine the level of contamination in the concrete to presumably exclude contaminated concrete from being reduced to rubble. I did not see that question addressed specifically.

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Template = ADM-013

R-REDS = ADM-03
Call = J. Parrot (SDPA)
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NorthStar also acknowledged that using the "rubblization" technique "could be viewed as a departure from the shutdown agreement between Entergy and Vermont. From what I can determine the relevant portion of that agreement stated:

Following completion of this site assessment study, EVY, PSD, ANR, and VDH shall work in good faith to determine in a timely and cost-effective manner overall site restoration standards necessary to support use of the property without limitation (excepting any independent spent fuel storage installation ("ISFSI") and any perimeter related to it), including that EVY shall not employ rubblization at the VY Station site (i.e., demolition of an above-grade decontaminated concrete structure into rubble that is buried on site) and addressing removal of structures and radiological exposure levels. [italics added]

This begs the question: if the parties, or perhaps the State of Vermont agencies, involved in the 2013 agreement were so adamant that the rubblization clause be included, they must have had some justification for proposing it. What was their rationale?

Of course, the bigger question lurking in the background is where that other location is that NorthStar or Entergy might haul contaminated material to. For such debris, there may simply be no "away." [cf. "Activists rail against Vermont Yankee fuel disposal," Mike Faher Brattleboro Reformer, May 13-14, 2017] But at least we could determine which material needs closer scrutiny.

Respectfully submitted:

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