

# PUBLIC SUBMISSION

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Regulatory Improvements for Production and Utilization Facilities Transitioning to Decommissioning

**Comment On:** NRC-2015-0070-0229

Regulatory Improvements for Production and Utilization Facilities Transitioning to Decommissioning

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## Submitter Information

**Name:** Christine Silva

**Address:**

Plymouth, MA, 02360

**Email:** christine.silva@raveis.com

**Phone:** 5089227080

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## General Comment

Last week , I had the opportunity to appear before the Massachusetts Joint Committee on the Judiciary, to testify in support of H 4444 / SD 2971. We must not allow one million gallons of nuclear waste water to be dumped into Cape Cod Bay.

The fact that a release of this kind can occur without the notification, let alone approval, of the NRC, EPA and Massachusetts regulators is deeply troubling. The big issue for me is that we truly do not know what the potential long-term implications are on a crucial portion of our ecosystem, the consequences of any contamination will be disastrous, and there is simply no reason to take this risk given that there are perfectly viable alternatives. It is a simple choice,, have the communities of the South Shore and the Cape risk a potentially irreversible environmental and economic catastrophe or have Holtec make a little less money.

The only safe option for our community is for Holtec to ship the water to a licensed storage facility offsite, an option that has been undertaken at other decommissioned nuclear power plants.

This is an environmental justice issue of the highest order for our community. Please, please respond to our Call for Action that was emailed today.

Hear is the video of the Save the Bay Rally last weekend. We must keep Holtec's feet to the fire!

<https://youtu.be/MwXq-VAzuus>

I wholeheartedly support an emergency bill, to prevent the discharge of (1) one million gallons radioactive materials into Cape Cod Bay.

Currently Holtec LLC is decommissioning our nuclear power plant and is cutting every corner it can, to do the easiest, cheapest disposal it can. Holtec International is a relatively small company based in Camden NJ which has never before decommissioned a nuclear facility. Despite its lack of experience in this very complicated technology of safely storing tons of toxic radioactive material, Holtec plans to decommission the Pilgrim plant years earlier than ever expected, thereby, reaping tens of millions of dollars from the decommissioning fund. (Holtec is looking to get out of town by 2027).

The Pilgrim Nuclear plant was sold by the Entergy Company to the Holtec Company for “a nominal cash consideration.” The Nuclear Regulatory Commission on August 22, 2019 approved that transfer. MA Attorney General Maura Healey twice contested this decision over concerns on Holtec's financial ability to decommission the site and for the need for an environmental assessment of the site before decommissioning begins. By the NRC approving the transfer the public was deprived of the opportunity to comment on the process. On June 17, 2020 the Attorney General and Holtec reached an agreement with the Holtec Company. Holtec agreed to comply with the state of Massachusetts' strict radiological cleanup standards.

Holtec has seriously underestimated the cost and dangers of decommissioning and is ill-equipped to handle the job safely. It is within our jurisdiction to protect the health and well-being of the citizens of MA

One does not need to have an advanced degree to understand that any release of radioactive material, any exposure to radioactive material is hazardous....

Plymouth Bay is an aquaculture bay for a variety of species including fin fish and shellfish. The discharge of radioactive materials means these fish WILL be harmed but it also means that humans consuming these fish may be harmed.

Moreover the economic impact to our real-estate values, & tourism is on the line. Each year, Americans take more than 900 million trips to coastal areas. In fact, ocean beaches constitute the top vacation destinations in the nation. Yet our waters provide more than just recreation—vacationers spend approximately \$44 billion annually during these coastal trips. Our nation's shoreline-adjacent counties contributed an estimated \$12 trillion toward the nation's gross domestic product and millions of jobs. Economic activity directly associated with the ocean pumped billions into the U.S. economy.

Yesterday one of my clients called me and stated “take Plymouth of my search”, they had seen the news on Channel 5 about dumping radioactive waste into the bay.

Studies have shown a significant relationship between hazardous waste sites and home prices. Also significant and negative relationships between water quality and home prices.

Holtec “accidentally” dumped 7000 gallons last November. Yesterday, I overheard a scallopers wife state there were no scallops to be harvested off the shore just south of the plant, none to be found or all dead.