

Save Our Bay MA
via Cape Downwinders
PO Box 303
South Harwich, MA
02661



Chairman Christopher T. Hanson
U.S. Nuclear Regulatory Commission
Mail Stop O-16 B33
Washington, DC 20555-0001
26 May 2022

RE: Holtec-Pilgrim plans to dump one million gallons of radioactive water into Cape Cod Bay

Dear Chairman Hanson,

We are writing to you regarding the urgent matter of Holtec Decommissioning International plans to dump a million gallons of radioactive waste water into Cape Cod Bay. Senator Edward Markey, Senator Elizabeth Warren, and Representative Bill Keating along with our state and local representatives, town boards, and citizen petition initiatives on the South Shore, Cape Cod, and Martha's Vineyard have called on Holtec to not dump any radioactive water into our bay. There is a huge public outcry to halt Holtec's plan.

There is a way you can help us to prohibit this dumping that would harm our families, damage the local fishing and shellfish industry, hurt the coastal real estate and tourism, harm the habitat of marine life, particularly the endangered right whale, and violate our right to safety. Local economies would be devastated as would our environment.

10 CFR 20.1310(f) states, "The Commission may impose additional restrictions on radiation levels in unrestricted areas and on the total quantity of radionuclides that a licensee may release in effluents in order to restrict the collective dose."

Thus, we request the NRC implement this regulation to prohibit Holtec from discharging radioactive water into Cape Cod Bay by restricting the amount of radionuclides in the effluent to ZERO.

In addition, Holtec cannot meet the NRC ALARA [As Low As Reasonably Achievable] requirement by reducing the amount of radioactivity in Pilgrim's contaminated water before it is dumped into the bay or by evaporating it on-site. NRC's Backgrounder on Tritium states that, "In principle, no dose should be acceptable if it can be avoided." In addition, NUREG/CR-2907, Vo.24, 1.2 states, "Maintaining radiation doses from radioactive effluents 'as low as reasonably achievable'" is an NRC requirement.

NRC also states it supports no threshold-no safe dose as does the National Academies of Science in their Biological Effects of Ionizing Radiation VII report. The science tells us and we all can agree, there is no safe dose, particularly for the fetus, infant, child, and females.

Holtec can avoid any doses and meet the ALARA requirement only by using their other option-transporting the contaminated water to an off-site radioactive low-level waste facility for containment. The waste water must be contained from the environment.

We respectfully concur that these NRC positions clearly lead to shipping and containment, not dumping Pilgrim's one million radioactive contaminated water into our Ocean Sanctuary. Damaging impacts would ripple throughout our communities when a viable option is available to avoid such consequences. With the option to truck the water to a licensed facility like Vermont Yankee chose to implement, there is no need to contaminate our fragile and precious Cape Cod Bay.

However, dumping into the bay is still Holtec's priority plan and must be removed. In order to uphold the NRC mandate to protect the people and environment, **we request the NRC invoke CFR 20.1310(f) to prevent Holtec from discharging radioactive water by restricting the amount of radionuclides in the Pilgrim liquid effluent to ZERO.**

Can we schedule a virtual meeting with you to have a conversation regarding our concerns and rationale for no dumping?

We look forward to your response as this is a timely matter.

For the Save Our Bay MA Coalition,

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CC:

Senator Ed Markey

Senator Elizabeth Warren

Rep. Bill Keating

Governor Charlie Baker

Attorney General Maura Healey

Secretary, Energy and Environmental Affairs Beth Card

Senator Susan Moran

Senator Julian Cyr

Senator Patrick O'Connor

Senator President Karen Spilka

House Speaker Ronald Mariano

Rep. Josh Cutler

Rep. Kathleen LaNatra

Rep. David Vieira

Rep. Dylan Fernandes

Rep. Kip Diggs

Rep. Timothy Whelan

Rep. Sarah Peake

John Mahoney, Co-Chair, Nuclear Decommissioning Citizens Advisory Panel

Pine DuBois, Co-Chair, Nuclear Decommissioning Citizens Advisory Panel

Dr. Barry Potvin, Chair, Plymouth Board of Health

Chairman Resource

From: Diane Turco <tturco@comcast.net>
Sent: Thursday, May 26, 2022 5:26 PM
To: Chairman Resource
Cc: edward_markey@markey.senate.gov; Thomas, Benjamin (Markey); Rodrigues, Paige (Markey); elizabeth_warren@warren.senate.gov; Benson, Hannah (Warren); Jackman, Michael; Schofield, Seth (AGO); Alicia Rebello-Pradas; Cyr, Julian (SEN); Moran, Susan (SEN); Holcomb, Michael (SEN); Ganz, Elizabeth (SEN); Syrniotis, Maria (SEN); Sen. Patrick O'Connor; karen.spilka@masenate.gov; ronald.mariano@mahouse.gov; Josh Cutler; Rep Kathleen LaNatra; David Vieira; Fernandes, Dylan - Rep. (HOU); kip.diggs@mahouse.gov; timothy.whelan@mahouse.gov; Ferrara, Sarah (HOU); Sarah Peake; John Mahoney; Pine duBois; Barry Potvin; craig.gilvarg@mass.gov; env.internet@mass.gov; beth.card@mass.gov; charlie.baker@mass.gov; karyn.polito@mass.gov; Mark E. DeCristoforo; Mary Lampert; James lampert; Henrietta Cosentino; Pickering, Seth (DEP); Priest, Jack (DPH)
Subject: [External_Sender] URGENT: NRC enforce 10 CFR 20.1310(f) to protect Cape Cod Bay
Attachments: Save Our Bay NRC CFR restrictionsALARA.pdf

Dear Chairman Hanson,

Attached is a letter from the Save Our Bay MA Coalition requesting the NRC implement **10 CFR 20.1310(f)** for Cape Cod Bay to protect the people and environment from Holtec's plan to discharge a million gallons of Pilgrim's radioactive water into our precious coast and marine sanctuary. The potential public health and economic impact of such a discharge is immeasurable. Not only is the public health threat to residents along the shore and those who use the bay for recreation significant, but the potential for severe economic harm is paramount, particularly for those in the fishing, tourist, and real estate industries.

Stakeholders in Massachusetts are overwhelmingly against the discharge as are Senator Markey, Senator Warren, and Rep. Keating.

This matter is urgent and requires the NRC to act on our behalf.

We look forward to hearing from you.

Thank you for your time and consideration,
Diane Turco, Director
Cape Downwinders for Save Our Bay MA Coalition