



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

ENTERGY NUCLEAR OPERATIONS, INC.,
ENTERGY NUCLEAR PALISADES, LLC,
HOLTEC INTERNATIONAL, and HOLTEC
DECOMMISSIONING INTERNATIONAL,
LLC

(Palisades Nuclear Plant and Big Rock Point
Site)

Docket No(s). 50-255-LT-2
50-155-LT-2
72-007-LT
72-043-LT-2

ASLBP No. 22-974-01-LT-BD01

Hearing Exhibit

Exhibit Number:

Exhibit Title:

**Statement of Professional Qualifications
Richard H. Turtill, Senior Financial Analyst
Office of Nuclear Material Safety and Safeguards (NMSS),
Division of Rulemaking, Environmental, and Financial Support
Financial Assessment Branch
U.S. Nuclear Regulatory Commission**

Mr. Turtill is a Senior Financial Analyst with over 10 years of nuclear power reactor financial qualification and decommissioning funding assurance experience, and fifteen years of experience in the fields of low-level radioactive waste and high-level radioactive waste storage and disposal management, decommissioning of NRC materials licenses, and nuclear security. His responsibilities include ensuring adherence to decommissioning funding assurance and financial qualification regulations, foreign ownership, control, or domination requirements, and onsite and offsite insurance and indemnity requirements by NRC licensees and applicants for NRC licenses, both during operations and during decommissioning. Mr. Turtill has been the primary analyst in evaluating the financial qualification of several applicants for new reactor licenses and for the transfer of existing reactor licenses, including for purposes of decommissioning. He currently serves in a technical leadership capacity addressing Dodd-Frank Wall Street Reform and Consumer Protection Act legislative requirements affecting the NRC guarantee mechanisms used for decommissioning funding assurance, and has led the agency's efforts to evaluate the status of decommissioning funding assurance for the 93 operating and 26 decommissioning reactors licensed by the NRC, including evaluating the possible risks to, and shortfalls in, such assurance.

EDUCATION

B.S., Chemical Engineering, University of Pennsylvania, Philadelphia, PA 1983
M.B.A., University of Maryland, College Park, MD 1997
M.S., Finance, University of Maryland, College Park, MD 1997

EXPERIENCE

August 2012 – Present: Senior Financial Analyst, NRC, NMSS Division of Rulemaking, Environmental, and Financial Support and NRR Division of Inspection and Regional Support

Helps ensure that owners of nuclear power plants adequately plan for and provide funding to meet decommissioning liabilities, including funding required for radiological decommissioning and for managing spent nuclear fuel. Evaluates and confirms that the funds required to complete radiological decommissioning are secured by the U.S. fleet of 93 operating commercial nuclear power reactor licensees and 26 decommissioning reactor licensees, and assesses possible risks to, and shortfalls in, such funding. Applies the NRC's financial qualification requirements to evaluate the industry's use of financial instruments in the planning for and funding of the construction and operation of new and existing nuclear power plants. Evaluates financial qualification and decommissioning funding assurance with respect to transfers of nuclear power reactor licenses, including for reactors in decommissioning. Evaluates exemptions related to the use of nuclear decommissioning trusts by licensees. Has provided sworn testimony to the Commission, responded to inquiries from members of Congress, briefed international organizations with responsibility for decommissioning oversight and decommissioning funding policy, and provided presentations to member states of the Organization of Agreement States on anticipated changes to NRC decommissioning funding assurance regulations.

February 2007 – August 2012: Chief, NRC, Office of Federal and State Materials and Environmental Management Programs, Intergovernmental Liaison Branch

First line supervisor leading a staff of 7 individuals. Established coalitions and strengthened communications within the NRC and with external parties, including with State, Native American, and Federal Agency representatives. Maintained communications with Governor-appointed State Liaison Officers, with the White House Council on Environmental Quality, with the Conference of Radiation Control Program Directors, and with Native American Tribes and Tribal organizations. Supported intra-agency efforts to communicate with interested stakeholders on uranium recovery licensing in Western states near Tribal lands. Led government-to-government consultations with Native American Tribal representatives. Oversaw the development and publication of the NRC's first "Tribal Protocol Manual" to enhance the staff's communication with Native American tribes. Participated on and ensured staffing of the State Liaison Team at the NRC Operations Center during the agency's response to the March 2011 Japan earthquake and tsunami.

November 2003 – February 2007: Technical Assistant and Program Manager (Radioactive Material Sources), NRC, Office of Nuclear Security and Incident Response (NSIR) Division of Security Policy

Technical Assistant to the Director, Division of Security Policy, overseeing day-to-day operations and activities. Reviewed security policy issues associated with nuclear materials licensees, nuclear power reactors, and research and test reactors. Developed protective measures (PMs) for civilian use of high-risk radioactive sources. Worked closely with staff from the NRC, the various Agreement and non-Agreement States, and other federal agencies and built consensus on enhanced security measures for high-risk sources. Collaboratively worked with stakeholders within the NRC on the development of materials PMs. Coordinated and drafted responses to Commission inquiries addressing nuclear security issues and developed and finalized responses to inquiries from senior level government officials and from members of Congress. Participated in weekly threat briefs.

February 1991 – July 1999; April 2000 – March 2002: Project Manager, NRC, NMSS Division of Waste Management

Evaluated and resolved radioactive waste generation, handling, and disposal issues of nuclear fuel cycle licensees, including uranium milling and enrichment, and reactor operations. Managed the NRC special nuclear material license at the Barnwell, S.C., disposal site. Reviewed requests for exemptions and a request for renewal of the license and analyzed criticality and security considerations. Author and primary contact for the rule expanding nuclear power reactors' waste treatment options under 10 CFR 50.54(ee). Assisted States and radioactive waste Compacts to site, characterize, and license disposal facilities as required by federal statute. Acted as NMSS's liaison to the Advisory Committee on Nuclear Waste/Advisory Committee on Reactor Safeguards for low-level radioactive waste, high-level radioactive waste, and decommissioning issues. Project manager for Site Decommissioning Management Plan sites including facilities in Oklahoma, Illinois, Pennsylvania, and California. Reviewed site decontamination and waste handling plans and activities.

OTHER

2011 – 2017: Chairman, Board of Directors, Energy Federal Credit Union, \$100 million credit union serving the NRC and the U.S. Department of Energy