

**Riverkeeper Perspective  
on Groundwater  
Protection at Operating  
Reactor Sites**

**February 24, 2011**

**Phillip Musegaas  
Hudson River Program  
Director  
Riverkeeper, Inc.**

# **Riverkeeper**

- **Riverkeeper is a nonprofit membership organization, founded in 1966, whose mission is to protect and restore the Hudson River and safeguard the New York City drinking water supply.**
- **Involved with Indian Point and national nuclear regulatory issues since 1970.**

# **Response to SECY-11-0019**

- **Voluntary industry initiatives are insufficient to address increasing instances of groundwater contamination at reactor sites (Finding #1)**
- **Riverkeeper supports revising the performance indicator for radiological effluent to focus on trending degrading performance (Finding #2)**

# **Response to SECY-11-0019**

- **Power reactor licensees should be required to provide specific financial assurance for remediation of subsurface contamination pursuant to 10 CFR 50.75 (f)(3). (Finding #3)**



# **Response to SECY-11-0019**

- **Non-safety related underground piping that carries radioactive fluids should be subject to corrosion protection standards and improved inspection requirements (Finding #4)**

# **Riverkeeper Recommendations**

- **Require onsite groundwater monitoring and reporting at all currently operating reactors**
- **Require licensees to submit all records pursuant to 10 CFR 50.75(g) (specifically (g)(1), (2)(3)) to the NRC for public disclosure. (See SECY-11-0019, pg. 4)**

# **Recommendations (cont.)**

- **Require licensees with documented leakage incidents to affirmatively prove cessation of leaks and fully evaluate status/condition of all systems, structures and components that carry radioactive fluids to reduce likelihood of future leaks**

# Thank you

- [phillip@riverkeeper.org](mailto:phillip@riverkeeper.org)
- [www.riverkeeper.org](http://www.riverkeeper.org)