

Congress of the United States
Washington, DC 20515

January 12, 2022

Kelly Trice
President
Holtec Decommissioning International
1 Holtec Boulevard
Camden, NJ 08104

Dear Mr. Trice,

We write to express our opposition to the proposed discharge of radioactive water from Pilgrim Nuclear Power Station (Pilgrim) into Cape Cod Bay. In December 2021, the Massachusetts congressional delegation, local and state officials, residents, and the fishing, agricultural, and tourism industries raised concerns about Holtec Decommissioning International's (Holtec) plan to discharge approximately one million gallons of irradiated water from Pilgrim's spent fuel cooling pool into Cape Cod Bay—a volume nearly three times greater than Pilgrim has released over any prior year. Although we are pleased that Holtec responded by confirming that it would not dump radioactive material into Cape Cod Bay during 2022, this delay does not fully address the serious concerns that were raised. Given the impact that the discharge of this radioactive water could have on the Cape Cod Bay community, we urge Holtec to pursue — and publicly share information about — alternative methods of disposal.

The strong public opposition to news of the proposed discharge reflects Holtec's failure to engage in the forthright, open, and transparent process that it promised the Plymouth community and the Commonwealth of Massachusetts when it took over the operating license for the decommissioning of Pilgrim. Holtec's proposal to discharge approximately one million gallons of radioactive water into Cape Cod Bay would only further burden the community surrounding Pilgrim, which has already borne the negative environmental impacts of the nuclear plant for more than 40 years.¹ Forcing this latest discharge upon the community would threaten the reputations and operations of the many businesses and organizations that rely on Cape Cod Bay's reputation for clean and safe water.

When evaluating the proper method of disposal, Holtec must consider the public's concerns surrounding and perception of the release of irradiated material into Cape Cod, especially when viable alternatives are available. In 2021, during the decommissioning of the Vermont Yankee Nuclear Power Plant (Vermont Yankee), the NRC approved the plans of NorthStar Nuclear Decommissioning Company (NNDC), Vermont Yankee's licensed operator, to ship approximately two millions gallons of radioactive water to the US Ecology facility in Grand

¹ Email from Cong. Affairs Officer, NRC, to Cong. Staff (Dec. 15, 2021 6:04 PM EDT) (on file with a author); *Radioactive Effluent and Environmental Reports for Pilgrim I*, Nuclear Regulatory Commission (Aug. 28, 2020), <https://www.nrc.gov/reactors/operating/ops-experience/tritium/plant-specific-reports/pilg.html>.

View Idaho for disposal.² NNDC agreed to pursue this method of disposal following public outcry from the Vermont Yankee community regarding NNDC's initial plans to discharge radioactive water into the Connecticut River. As NNDC did at Vermont Yankee, Holtec could transport any remaining radioactive material at Pilgrim to the available facility in Idaho. This would be a viable alternative to the discharge of radioactive material into one of the most important areas of marine life and economy in the United States.

A commitment from Holtec to pursue alternative methods of disposal, including the solidification and shipment of this waste, would be a first step towards rebuilding trust and fulfilling the commitment to transparency with the Cape Cod Bay community. Going forward, we urge Holtec to engage with the community on any potential future discharge of material into Cape Cod Bay, regardless of the reporting requirements outlined in NRC regulations. We also ask that Holtec provide our offices and community stakeholders with more detail on other available disposal methods—including methods that have been successful at plants such as Vermont Yankee. Without a firm commitment to these requests, Holtec will have failed to live up to its commitment to our communities to ensure an open and transparent decommissioning process.

This matter is extremely important to the constituents that we represent, and we urge Holtec to treat this request with an equivalent level of care and seriousness. If you have any questions about this request, please contact Andrew Nelson in Representative Keating's office at (202) 225-3111, Hannah Vogel in Senator Markey's office at (202) 224-2742, Bruno Freitas in Senator Warren's office at (202) 224-4543, or Kelly Bovio in Representative Moulton's office at (202) 225-5915.

Sincerely,


William R. Keating
Member of Congress


Edward J. Markey
United States Senator


Elizabeth Warren
United States Senator


Seth Moulton
Member of Congress

² Radwaste Solutions, *NorthStar to ship Vermont Yankee's low-activity wastewater to Idaho*, NuclearNewswire (May. 10, 2021), <https://www.ans.org/news/article-2880/northstar-to-ship-vermont-yankees-lowactivity-wastewater-to-idaho/>.