



Congress of the United States
House of Representatives
Washington, DC 20515

January 28th, 2022

The Honorable Christopher Hanson
Chairman
U.S. Nuclear Regulatory Commission
Mail Stop O-16 B33
Washington, DC 20555-0001

RE: Proposed Release of Irradiated Water at Pilgrim Nuclear Power Station into Cape Cod Bay

Dear Chairman Hanson,

It has been brought to my attention that Holtec International, the owners of the Pilgrim Nuclear Power Plant site in Plymouth Massachusetts, intended to release millions of gallons of irradiated water into Cape Cod Bay. I write to you today to respectfully request that the Nuclear Regulatory Commission examine its own regulations and potentially assemble an interagency taskforce of the Environmental Protection Agency, the Massachusetts Dept of Environmental Protection, and representatives from the Department of Energy, to examine the lack of transparency and communication surrounding this release of irradiated waste. I would ask that the NRC, or this panel, determine whether these kinds of discharges should be further regulated.

I am asking you to examine these questions because I believe that any discharge of this kind from Pilgrim is detrimental to the reputation of the town of Plymouth, surrounding communities, as well as regional tourism and aquaculture. Public perception of the release of irradiated material into the Cape Cod Bay must be considered when evaluating the proper method of disposal especially when there are cost effective alternatives available. This is an environmental justice issue of the highest order for our community.

Cape Cod Bay and the surrounding communities are known worldwide for the value of their seafood and support one of the largest aquaculture industries in the nation. Should a release of this kind occur, the safety and quality of these products could be brought into question by consumers, as they will now be associated with radioactivity. Beyond the potential damage to these iconic New England industries, Southeastern Massachusetts is largely dependent on tourism to support its economy. The decision that consumers make about their travel and recreation can be driven by as little as a single news story about a region. Should Holtec International decide in the future to reverse course and release this material into Cape Cod Bay, vacationers may simply decide to travel to a different locale at does not have any association

with radioactivity. Communities should not be burdened by companies like Holtec externalizing the costs that they have agreed to bear in the decommissioning process.

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. Our constituents rely on your agency and these others to ensure public safety and continued preservation of our shared environment. When a company like Holtec International engages in a practice like the proposed release of this material, as it claims to be able to do without the oversight of your agency, it erodes the public trust in our government's ability to adequately regulate pollution and to protect its citizens from potential environmental contamination. As the NRC examines how it can better regulate this industry from an environmental justice perspective the concerns raised by the community around Pilgrim should be considered first and foremost.

A discharge of irradiated material into a body of water unquestionably has associated economic and social consequence for the surrounding community. I believe that your agency should consider these individual releases in this context. I also request that an analysis of the potential damage that these irradiated water releases could have on regional stakeholders be undertaken by the NRC in concert with Mass DEP and EPA prior to consideration of any similar releases at Pilgrim Nuclear Power Station.

The process of "over boarding" this material is simply the least expensive manner of disposing the irradiated waste remaining at Pilgrim Nuclear Power Station. Other alternatives exist to manage this waste that will not delay the ongoing decommissioning process. As you are aware, options include solidifying the waste and shipping it to a low hazard waste facility in Idaho. Discharging millions of gallons of irradiated material into Cape Cod Bay is the wrong decision for my constituents and will have long-lasting negative impacts on a community that has been burdened for decades by the presence of a nuclear power plant. This issue is fundamental to considering the environmental justice impacts that have already occurred in our communities because of Pilgrim.

Allowing further discharges with the low level of oversight and public engagement that Holtec International has so far undertaken, while possibly meeting the technical requirements of the law, has not held up to the commitment that Holtec International has made to work through an open and transparent process while decommissioning of the Pilgrim Nuclear Power Station. This is not acceptable given the longstanding lack of trust between the community the operators of the Pilgrim Station. Acting in this high-handed manner Holtec is not committing to the open and transparent policy making that is needed to ensure that our communities are fully engaged in the process, this strikes against all the core principles that underly the environmental justice movement.

The potential release of this irradiated material greatly concerns me as a resident of the Commonwealth of Massachusetts and as the representatives of the thousands of people impacted by these decisions. This behavior has resulted in a great outcry amongst my constituents who feel that this process lacks the transparency that we were promised. Therefore, I believe, to better ensure that the decommissioning process at Pilgrim is conducted in an open and transparent

manner, that your agency should seek to lead its partners in clarifying this process for the public as soon as possible.

I thank you for your consideration of this matter. If you have any questions, please contact Congressman Keating's Advisor Andrew Nelson at: Andrew.Nelson@mail.house.gov or (202)-225-3111.

Sincerely,

A handwritten signature in black ink, reading "William R. Keating". The signature is written in a cursive style with a large, sweeping initial "W".

William R. Keating
Member of Congress