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Good morning Committee Members,

Thank you for allowing me the opportunity to provide a community perspective of the HOLTEC decommissioned power plant in Plymouth.

I am here as the State Senator representing many of the communities that are impacted by the Holtec/Pilgrim Power Plant. My colleagues, including Senators Cyr and O'Connor and Representatives Peake, Muratore, Fernandes, LaNatra, Cutler, Xiarhos, Diggs, Viera, and Whelan, and I have been working diligently fielding concerns from our constituents. I hope that our concerns will be incorporated into decommissioning practices to protect the long-term health, safety, and economic success of the communities we serve. The way we handle the safe closing of this nuclear power plant will set a precedent for others throughout the country. We have a unique opportunity to examine the shortfalls of this situation and set guidelines and expectations for others to follow.

As you know, the nuclear reactor at Pilgrim Nuclear Power Station shut down on May 31, 2019. That August, Holtec acquired Pilgrim after the Nuclear Regulatory Commission (NRC) approved the transfer of the plant's license. Shortly thereafter, the Massachusetts Attorney General filed a lawsuit out of concern that funding deficits based on Holtec's decommissioning cost estimate proposal and insufficient funding in the Decommissioning Trust Fund would result in possible health, safety, environmental, and financial risks to the state and residents. More broadly, the public have ongoing concerns that range from sufficient funding for proper oversight and monitoring of decommissioned facility, Pilgrim's exemption from emergency planning and preparedness requirements, safety and security issues of dry cask

storage units, and, most recently, alarming statements of Holtec's plan to dump one million gallons of radioactive water into Cape Cod Bay.

Since the license transfer there has been a lack of transparency and opportunity for public input. This lack of communication and disregard for transparency and community involvement leads to a collective feeling of an imminent threat to residents. Unfortunately, there's been little reassurance. There is a serious incongruity in the oversight of decommissioned power plants, specifically in reference to the proposed dumping of radioactive material into Cape Cod Bay. Holtec is currently prohibited from discharging water from the site unless it receives an updated National Discharge Elimination System (NPDES) Permit. The updated permit would require EPA oversight of pollutants in the water. However, as defined by the Clean Water Act, the term "pollutants" does not include radioactive material, including radioactive waste. Therefore, unless there are additional pollutants to require a denial of an NPDES Permit, EPA is powerless to intervene even if the levels of radioactive waste are toxic. Oversight may then fall to NRC, who sets radioactive water discharge limits four times higher than the EPA recommends. Neither of these limits speak directly to the impact of cumulative discharge and their impact of marine life in Cape Cod Bay. We have a situation where one government agency is pointing to another and in some instances contradicting itself while the residents raise the alarm.

Any potential risk to the Bay is a risk to public health, the tourism industry, and the commercial fishing industry, and the risk is very real. I recently spoke with Robert Ward of Home Port-Plymouth. Mr. Ward has been fishing since he was 13 years old. He learned the craft from his father. Mr. Ward is part of the South Shore fishing industry that generates \$6-8 million in revenue annually and is part of the chain for a successful and environmentally responsible local economy. They stock local restaurants and purchase ropes and maintenance from hardware stores in town. Mr. Ward and others in the fishing industry guard the oceans to keep them whale safe and often make profit sacrifices to maintain aquatic ecosystems. Mr. Ward expressed very clearly to me that there is a real fear that dumping radioactive discharge will create a negative perception of local industry, and this will harm an industry made of small businesses working on tight margins.

Mr. Ward is absolutely right. We still have a serious lack of understanding of what is in the potential discharge, the manner of depositing into Cape Cod Bay, and who is responsible for mandating this testing. The concentration of any chemical can be altered depending on season, time that has gone by and amounts released and how those chemicals react in a different environment. In the course of failing to provide

this information, Holtec has allowed fear to spread and compounded the economic impact of their announcement. Frankly, the announcement of dumping material into the Bay demonstrates a callous disregard for the health and livelihoods of our communities and significantly undermines public trust in Holtec's decision-making.

There are few guardrails to protect our communities. This must change. In calls, emails, testimony, and rallies our constituents are telling us loudly and clearly that they are fearful of what will happen now and for generations to come if we allow Holtec to discharge large volumes of radioactive waste into Cape Cod Bay without greater oversight and better safeguards. We have an obligation to listen and respond.

Many of these subject are further detailed in written testimony that was submitted by me and other members of the Massachusetts State Legislature representing the South Coast, Cape, and Islands. I look forward to answering any questions you may have and continuing to collaborate to ensure the safe closure of this facility.