



P.O. Box 303
South Harwich, MA 02661
September 3, 2019

Kristine L. Svinicki, Chair
Nuclear Regulatory Commission
Mail Stop-P-16 B33
Washington, DC 20555-0001
chairman@nrc.gov

Dear Chairman Svinicki,

Cape Downwinders and Citizens Awareness Network are regional citizens organizations advocating best protection for the public and environment during the decommissioning and spent fuel management activities at the Pilgrim Nuclear Power Station in Plymouth, MA. On August 19, we sent you a request for the Pilgrim license transfer to be suspended until raised contentions were resolved. On August 26, the NRC responded that "the Commission must remain impartial during the pendency of the adjudication". This is not acceptable. Given the NRC license approval on August 22, we are now including additional support for our request from 96 organizations across the U.S. and Canada as follows:

We, signed below, are very concerned that the NRC Commissioners, mandated to protect the public and environment, approved the License Transfer Application from Entergy to Holtec without a public hearing on the contentions filed. We fully support our Massachusetts Attorney General's Office and Pilgrim Watch petitions to intervene and find that the premature NRC decision to approve the license transfer only supports Holtec's financial interest and not standards for public health and safety that clearly impact our communities.

The NRC promotes the value of communication and public input, yet, when it comes to legal intervention pursued on our behalf by our AGO, the NRC not only denied a stay of 90 days but plowed forward to meet Holtec's demands with license approval before an adjudicatory hearing is held. Business as usual.

In their petition to intervene, the AGO identified the "risk of a funding shortfall is radiological, environmental, and financial." This is a serious matter that requires methodical examination; Holtec's bottom line is secondary to the health and safety of the Commonwealth, its citizens and the impacted community. It should be for the regulator as well. It is essential that decommissioning is accomplished in the safest and most responsible manner. That is not guaranteed with the limitations of the present decommissioning fund and Holtec's potential financial vulnerabilities and lack of experience. The petitioners have raised serious issues that must be resolved before NRC approval of the license transfer. Once again, the NRC fails to respond to public concerns.

Approving the license before a hearing also removes any incentive for Holtec to meet the recommendations of the Commonwealth and Pilgrim Watch.

Will the public concerns be heard and acted upon by you and the Commissioners? We, the citizens, do not consent to the license transfer at this time. We again petition to suspend the license transfer from Entergy to Holtec until there is resolution to the contentions raised. Otherwise, the NRC has reneged its responsibility to the people they are mandated to protect.

On behalf of concerned organizations across the U.S. and Canada, we look forward to your response.

Cape Downwinders, Harwich, MA/Diane Turco, Director tturco@comcast.net

Citizens Awareness Network, Shelburne Falls, MA/Deb Katz, Executive Director deb@nukebusters.org

AND:

Albuquerque Monthly Meeting of the Religious Society of Friends, NM/Sara Keeney, Chadron Kidwell, Co-Clerks

Algonquin Eco Watch, Ontario, Canada/Mike Wilton, President

Alliance for Environmental Strategies, Eunice, NM/Rose Garder, Founder

Alliance to Halt Fermi-3, Livonia, MI/Keith Gunter, Board Chair

American Friends Service Committee, Cambridge, MA/Keith Harvey, Northeast Regional Director

Association to Preserve Cape Cod, Dennis, MA/Andrew Gottlieb, Executive Director

Beyond Nuclear, Tacoma Park, MD/ Paul Gunter, Director, Kevin Kamps, Nuclear Waste Specialist

Boston Downwinders, Newton, MA/Guntram Mueller, Convener

Bruce Center for Energy Research Information, Inverhuron, Ontario, Canada/Eugene Bourgeois, President

Bronx Climate Justice, North Bronx, NY/Jennifer Scarlott, Coordinator

Campaign for Peace, Disarmament, and Common Security, Cambridge, MA/Joseph Gerson, PhD, President

Canadian Coalition for Nuclear Responsibility, Montreal, Quebec/Gordon Edwards, President

Canton Residents for a Sustainable, Equitable Future, Canton, MA/Jennifer Wexler, President

Citizens Against Radioactive Neighbourhoods, Peterborough, Ontario/Jo Hayward-Haines, Contact

Citizens Against the Rehobeth Compressor Station, MA/Tracy Manzella, Organizer

Citizens for Alternatives To Radioactive Dumping, Albuquerque, NM/Janet Greenwald, Coordinator

Citizens Power, Inc., Pittsburg, PA/David Hughes, President

Citizens' Resistance at Fermi Two (CRAFT), Redford, MI/Jessie Pauline Collins, Co-Chair

Clean Water Action, Brick, NJ/Janet Tauro, Board Chair

Coalition Against Nukes, Sag Harbor, NY/Priscilla Star, Founder and Director

Coalition For A Nuclear Free Great Lakes, Monroe, MI/Michael J. Keegan, Chairperson

Committee for Future Generations, Beauval, Saskatchewan/Candyce Paul, Outreach Coordinator

Concerned Citizens for Nuclear Safety, Santa Fe, NM/Joni Arends, Executive Director

Concerned Citizens of Allegany County, Inc., Angelica, NY/Karen Ash, Chair

Concerned Citizens of Lacey, LLC, Lacey, NJ/Paul Dressler, Founder

Don't Waste Michigan, Holland, MI/Alice Hirt, Co-Chair

Duxbury Nuclear Advisory Committee, Duxbury, MA/Rebecca Chin, Co-Chair

Elders Climate Action Massachusetts, Cambridge, MA/Grady McGonagil, Ed.D, Founder

Engage Falmouth, Falmouth, MA/Elise Hugus, Convener

Environmental Massachusetts Research and Policy Center, Boston, MA/Ben Hillerstein, State Director

Friends of the Earth, Washington, D.C./Damon Moglen, Senior Strategic Advisor
GRAMMES (Grandmothers, Mothers, and More for Energy Safety), Brick, NJ/Jeff Brown, founding member
Greenpeace USA, Washington, D.C./Charlie Cray, Political and Business Strategist
Gray Panthers of Metro Detroit, MI/Randy Block, MSW, Chair, National Council of Gray Panthers
Greater Boston Physicians for Social Responsibility, Boston, MA/Anna Baker, MPH, Executive Director
Heart of America Northwest, Seattle, WA/Peggy Maze Johnson, Coordinator
Hudson River Sloop Clearwater, Inc., Beacon, NY/Manna Jo Greene, Environmental Director
Indian Point Safe Energy Coalition, Cortland Manor, NY/Marilyn Elie, Organizer
League of Women Voters Cape Cod Area, MA/Suzanne Brock, Richard Utt, Steering Committee
League of Women Voters Plymouth Area, MA /Henrietta Cosentino, Chair, Nuclear Affairs Committee
MA Peace Action, Cambridge, MA/Cole Harrison, Executive Director
Martha's Vineyard Island 350, Tisbury, MA/Ann Rosenkranz, Steering Committee Member
MASSPIRG, Boston, MA/Janet Dominetz, Executive Director
New Mexico Interfaith Power and Light, Albuquerque, NM/Sr. Joan Brown, OSF, Executive Director
Michigan Safe Energy Future, Kalamazoo, MI/Iris Potter, Organizer
Michigan Stop The Nuclear Bomb Campaign, St. Clair Shores, MI/Vic Macks, Steering Committee
Mid-Missouri Peace Works, Columbia, MO/Mark Haim, Director
Mountain States Mennonite Conference, Taos, NM/Todd Wynard, Minister for Creative Justice
Native Community Action Council, Las Vegas, NV/Ian Zabarte, Secretary
Natural Resources Defense Council (NRDC), Washington, D.C./Caroline Reiser, Legal Fellow
Nevada Nuclear Waste Task Force, Las Vegas, NV/Judy Trelchel, Executive Director
New Mexico Environmental Law Center, Santa Fe, NM/Douglas Meiklejohn, Executive Director
New York Safe Energy Campaign, NY, NY/Ken Gale, Founder
Newton Dialogues, Newton, MA/Susan Mirsky, Organizer
No Fossil Fuel, LLC and Clean Power, Inc., Kingston, MA/Mary O'Donnell, President
No More Fukushimas, Amesbury, MA/Joanne Hammond, Organizer
North American Water Office, Lake Elmo, MN/George Crocker, Executive Director and
Lea Foushee, Environmental Justice Director
Northwatch, Northeastern Ontario/Brennain Lloyd, Project Coordinator
Nuclear Age Peace Foundation, NY, NY/Alice Slater, UN Representative
Nuclear Energy Information Service (NEIS), Chicago, IL/David Kraft, Director
Nuclear Information and Resource Service (NIRS), Tacoma Park, MD/Tim Judson, Executive Director
Nuclear Issues Study Group, Albuquerque, NM/Leona Morgan, Coordinator
Oak Ridge Environmental Peace Alliance, Oak Ridge, TN/Ralph Hutchison, Coordinator
Occupy Bergen County, Bergen County, NJ/Sally Gillert, Organizer
Occupy Hingham, Hingham, MA /John Gauley, Co-Founder
On Behalf of Planet Earth, Watertown, MA/Sheila Parks, Ed.D, Founder
Palisades Shutdown Campaign Coalition (PSCC), Kalamazoo, MI/Iris Potter, Bruce Brown, Co-Coordinaors

Peace Abbey Foundation, Sherbon, MA/Lewis M. Randa, Director
Physicians For Social Responsibility, Kansas City Metro Area Missouri/Kansas, Ann Suellentrop, Project Dir.
Pilgrim Coalition, Plymouth, MA/Norm Pierce, PhD, Executive Committee
Pilgrims for Safe Decommissioning, Plymouth, MA/Love Albrecht Howard, Contact
Project Andrews County, Andrews, TX/Elizabeth Padilla, Leader
Redwood Alliance, Arcata, CA/Michael Welch, Coordinator
Safe and Green Campaign, Brattleboro, VT/Leslie Sachs-Sullivan, Convener
Safe Energy Rights Group, Peekskill, NY/Nancy Vann, President
Samuel Lawrence Foundation, Del Mar, CA /Bart Zeigler, PhD, President
Shut Down Indian Point Now (SDIPN), NY, NY/Catherine Skopic, Chair
Sierra Club Massachusetts/Deb Pasternak, Chapter Director
Sierra Club National Nuclear Free Campaign, Oakland, CA/Susan Corbett, Chair
Six Ponds Improvement Association, Plymouth, MA/Lawrence H. Delafield, President
Stop Algonquin Pipeline Expansion, Rockland, Putnam, Westchester Counties, NY/Suzannah Glidden, Co-Founder
Sugar Law Center for Economic and Social Justice, Detroit, MI/John Philo, Executive and Legal Director
Sustainable Energy and Economic Development Coalition (SEED), Austin, TX/Karen Hadden, Organizer
Sustainable Middleborough, Middleborough, MA/Kimberly French, Organizer Team,
Sustainable South Shore, Norwell, MA/Todd Breitenstein, Organizer
Three Mile Island Alert, Inc., Harrisburg, PA/Eric Epstein, Chairman
Toledo Coalition for Safe Energy, Toledo, OH/Terry Lodge, Convener
Toxics Action Center, Boston, MA/Claire Miller, Organizer
UUMass Action, Marlboro, MA/Laura Wagner, Executive Director
Vermont Yankee Decommissioning Alliance (VYDA), Montpelier, VT/Debra Sloleroff, Organizer
Watertown Citizens for Peace, Justice and the Environment, Watertown, MA/Tony Palomba, Steering Committee
Women's Energy Matters, Fairfax, CA/Jean Merrigan, Executive Director
Women's International League for Peace and Freedom, Cape Cod Chapter, Harwich, MA/Donna Pihl, Convener
CC:

Senator Ed Markey
Senator Elizabeth Warren
Representative William Keating
Governor Charlie Baker
Attorney Maura Healey
Senate President Karen Spilka
House Speaker Robert DeLeo
Senator Julian Cyr
Senator Vinny deMacedo
Representative Sarah Peaks
Representative Tim Whalen
Representative William Crocker
Representative Dylan Fernades
Representative Randy Hunt
Representative Ruth Balser

Sean Mullin, Chair, Nuclear Decommissioning Citizens Advisory Panel
Ken Travares, Chair, Plymouth Board of Selectmen

CHAIRMAN Resource

From: Diane TURCO <tturco@comcast.net>
Sent: Tuesday, September 03, 2019 4:32 AM
To: CHAIRMAN Resource
Cc: hannah_vogel@markey.senate.gov; rory_clark@markey.senate.gov; james_cantwell@markey.senate.gov; Wong, Jessica (Warren); Benson, Hannah (Warren); michael.jackman@mail.house.gov; mindy.darbeloff@state.ma.us; monica.bharel@state.ma.us; Thomas.turco@state.ma.us; jack.priest@state.ma.us; Kathleen.Theoharides@state.ma.us; Julian.cyr@masenate.gov; vinny.demacedo@masenate.gov; sarah.peake@mahouse.gov; Timothy.Whalen@mahouse.gov; dylan.fernandes@mahouse.gov; david.vieira@mahouse.gov; william.crocker@mahouse.gov; randy.hunt@mahouse.gov; ruth.balser@mahouse.gov; seth.schofield@state.ma.us; Rebello-Pradas, Alicia (AGO); joseph.dorfler@state.ma.us; david.lews@nrc.gov; Sheehan, Neil; smullin@bi2technologies.com; dan.wolf@capeair.com; jflores@usdla.org; pine@jonesriver.org; elysse.magnotto@capeair.com; deb katz
Subject: [External_Sender] 96 organizations join call to suspend Pilgrim license to Holtec pending adjudicatory hearings
Attachments: CANCDW NRC LT ltr 96 organizations.pdf

Dear Chairman Svinicki,

Please find attached a letter signed by 96 organizations from across the U.S. and Canada protesting the Pilgrim license transfer to Holtec without adjudicatory hearings. We urge you to reconsider your decision and again call for suspension of the license transfer until hearings are held and contentions resolved. Our communities deserve a safe and responsible decommissioning of Pilgrim but that won't happen if our Attorney General does not have input on our behalf. The NRC mandate to protect the public and the environment is vital at this time and must be upheld.

We look forward to your response.

Sincerely,

Diane Turco, Director

Cape Downwinders

Harwich, MA