



To: Entergy Nuclear Vermont Yankee
Vermont Public Service Board
From: Christopher Campany, Executive Director
Date: June 13, 2014

John Bennett for Christopher Campany

Re: Entergy Nuclear Vermont Yankee Second Dry-Fuel-Storage Facility and Related
Modifications Certificate of Public Good - 30 V.S.A. § 248 Permit Process 45-Day
Advance Notice of Proposed Project

The Windham Regional Commission (WRC) is the Regional Planning Commission representing the interests of the 27 Vermont municipalities and 46,000 residents of southeastern Vermont. As a matter of policy, WRC does not support or oppose petitions for Section 248 approval. Rather, WRC seeks to have all issues of regional importance addressed within the Certificate of Public Good (CPG) process, and serves as a local source of information for our many constituents.

The WRC has reviewed the Entergy VY 45-day advance notice of a proposal to construct a second Dry Fuel Storage Facility, otherwise known as an Interim Spent Fuel Storage Installation (ISFSI). We appreciate the advance notification, and the offer by Entergy VY to provide a presentation on this project. While we have not requested a presentation on the prefile material, we will certainly consider requesting a public presentation on the petition itself, and we are especially appreciative of Entergy VY's efforts to communicate with the public.

We recognize the value in expeditiously moving spent fuel from wet to dry storage, and have advocated for prompt movement of spent fuel since our engagement in docket 7082 beginning in 2005. It is our hope that the approval process for a second ISFSI will be transparent and swift, and that whatever final Order is issued by the Board will serve regional interests.

We appreciate the overview information provided in the prefile notification and expect significant additional information will be included in the actual petition which we understand Entergy VY expects to file on or about June 30, 2014.

WRC asks that the formal petition provide additional information about the following topics:

- 1) Additional information about the alternatives considered, including the construction and ongoing cost of each, and the effect each alternative would have on the cost, complexity, and timing of full decommissioning and subsequent reuse of the site.

- 2) Additional information about the effect of storing spent fuel at the proposed location following decommissioning of the rest of the site, and the effect on-going storage of spent fuel at the proposed location will have on reuse of the property.
- 3) Additional information about the costs of storing spent fuel on the new pad, including an analysis of how those costs will be paid, what costs Entergy VY anticipates will and will not be reimbursed by the Department of Energy (DOE), and the anticipated delay period between incurring costs and reimbursement.
- 4) Additional information about the costs, anticipated timing, and proposed extent of decommissioning of the new ISFSI and the existing ISFSI, and how those costs will be paid, and if anticipated, reimbursed by DOE.
- 5) Information about the level of emergency response support that will be available on-site throughout the operational period of the new ISFSI, and any anticipated need for off-site emergency assistance including any response to the Station as a whole. Please include a description of all scenarios that might require off-site emergency support, the level of support needed, and the projected costs of providing that support.
- 6) Information about any financial support that Entergy VY anticipates providing to off-site emergency responders and for off-site emergency planning.
- 7) Information about anticipated changes in fenceline radiation following the addition of a second ISFSI, and options that Entergy VY will have to reduce fenceline radiation if levels exceed state standards.
- 8) Information about Entergy VY's willingness to comply with all previously negotiated MOU's (as agreed to in paragraph 17 of the docket 7862 MOU), *and to extend those commitments to the proposed new ISFSI.*
- 9) Information about on-site and off-site employment expressed in actual employment and economic impact for the Station throughout the anticipated life and decommissioning of the Station, and incremental employment and economic impact generated by the proposed ISFSI.
- 10) Information about tax payments that Entergy VY expects to make for the proposed and existing ISFSI's, and storage of spent fuel, and how Entergy VY anticipates its tax liability will be calculated.
- 11) Any plans that Entergy VY may have to store spent fuel from other sites at the VY Station, and any restrictions that Entergy VY is aware of that would prohibit storage of spent fuel from elsewhere at the VY Station site.
- 12) A list of all spent fuel movement campaigns to date and a projection of each future movement campaign, with a spreadsheet identifying how many assemblies will be in wet

storage and in dry storage on each ISFSI following each movement campaign (similar to the presentation in docket 7862, WRC-Cross-18).

WRC appreciates the opportunity to comment on this proposed CPG, and is especially appreciative of the chance to provide input to Entergy VY prior to the filing of their petition. WRC represents a large population with a diverse view of nuclear power, and does not seek to directly support or oppose the petition for a second ISFSI. WRC hopes that careful consideration of the proposed CPG will provide the public with necessary assurances regarding placement, operation, and eventual decommissioning of the proposed ISFSI. We look forward to reviewing the petition.