

**Potential Issues for NDCAP Advisory Opinions (as of 6.15.15)**  
**– For Discussion at June 25, 2015 NDCAP Panel Meeting –**

**From Bill Irwin**

Second ISFSI Issues (potential advisory opinions to Public Service Department and Public Service Board CPG process):

1. A condition for reporting the continuous radiation and temperature monitoring to the Public Service Department (PSD) and the Vermont Department of Health (VDH) is in place for the current ISFSI. That condition should be included for the second ISFSI.
2. The new ISFSI will be built where the current North Warehouse resides. That warehouse has been used extensively for storage of radioactive materials, mostly for those materials to be shipped offsite. Some materials being shipped also contained hazardous wastes, e.g. solvents, coolants or lubricants. Both may have contaminated soils under the warehouse. When that warehouse is razed and the soils beneath it are excavated for the second ISFSI, the VDH and the Department of Environmental Conservation (DEC) could be provided split samples at varying locations and depths to help assess conditions at the site that may not otherwise be known for decades.
3. Both the VDH and DEC could be informed in writing of the disposition of all building materials and soil excavation materials related to the razing of the north warehouse and the construction of the second ISFSI.
4. At a meeting with state representatives during the preparation of the Site Assessment Study, an Entergy executive noted there may be site boundary radiation dose concerns after the second ISFSI is occupied with the remaining spent fuel and greater than Class C (GTCC) waste. Entergy could provide calculations of the estimated site boundary dose after 1) all the spent fuel is on the ISFSIs, and 2) when the GTCC waste is also put on the ISFSI. These calculations may verify that shielding of the spent fuel and/or GTCC waste is or is not needed to comply with state and federal radiation dose limits at the site boundary.
5. There is a possibility that spent fuel assemblies have to be transferred from their original casks to new ones at some time. This would be the case when the cask license expires, if there are problems with one or more casks and for shipping spent fuel offsite for disposal at another facility. Entergy could be asked to provide a detailed analysis of their plans for these evolutions, and specifically about how the work would be done to prevent contamination of the environment or radiation dose to members of the public in excess of state or federal limits.

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6. When spent fuel is shipped offsite for disposal, it will be done most likely by rail. There is an abandoned rail spur that runs into the Entergy property near its northwest corner. Entergy could be asked to describe its plans to remediate that rail spur for this use during final disposal of spent fuel from Vermont Yankee operations.

7. The possibility in the near future that the NRC promulgates new rules or the Nuclear Energy Institute (NEI) initiates a recommended new program for decommissioning nuclear power plants. This would occur after Vermont Yankee has entered the decommissioning process. Entergy could be asked to commit to the requirements of those new regulations when promulgated or the new NEI program when initiated.

**From David Andrews**

8. Prompt removal of fuel from spent fuel pool and removal of all possible liquids (water and oils) from process equipment.

9. Minimizing withdrawals from the decommissioning trust fund to maximize fund growth.

10. Commencement of decommissioning as soon as the funds are available.