

STATE OF VERMONT
PUBLIC SERVICE BOARD

Petition of Entergy Nuclear Vermont Yankee,)
LLC, and Entergy Nuclear Operations, Inc., for a)
certificate of public good, pursuant to 30 V.S.A.)
§ 248 and 10 V.S.A. § 6522, authorizing the)
construction of a second independent spent fuel) Docket No. 8300
storage installation storage pad and related)
improvements, including installation of a new)
diesel generator with an electrical rating of)
approximately 200 kW, at the Vermont Yankee)
Nuclear Power Station in the Town of Vernon,)
Vermont)

PREFILED REBUTTAL TESTIMONY AND EXHIBITS OF JOHN GOODELL

Mr. Goodell's rebuttal testimony responds to the testimony from Mr. Evans of the Agency of Natural Resources regarding the river corridor delineation offered with Mr. Evans's testimony as Exhibit ANR-RE-2.

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1 Q1. Please state your name, occupation and business address.

2 A1. My name is John Goodell. I am a civil engineer with the firm of SVE Associates
3 ("SVE").

4

5 Q2. Have you previously provided testimony in this proceeding?

6 A2. Yes.

7

8 Q3. What is the purpose of your rebuttal testimony?

9 A3. My testimony responds to the testimony from Mr. Evans of the Agency of Natural
10 Resources regarding the river corridor delineation offered with Mr. Evans's testimony as
11 Exhibit ANR-RE-2.

12

13 Q4. Please explain the issue concerning the river corridor delineation.

1 A4. Mr. Evans testifies that the Second ISFSI is located within the Connecticut River corridor
2 and a permit from the Agency is necessary in order to construct the Project in the
3 proposed location. Mr. Evans also testifies, however, that the Agency has not completed
4 its analysis of the “appropriate” corridor for the Connecticut River. According to the
5 Agency’s discovery responses, it has had only preliminary internal discussions about
6 what “possible components of the site-specific studies” would be required to create the
7 river corridor map for the section of the Connecticut River adjacent to the VY Station.
8 (EN.ANR.1-12.). Notwithstanding the lack of a complete river site-specific study, the
9 Agency created a river corridor map specifically for this proceeding that is offered as
10 Exhibit ANR-RE-2.

11

12 Q5. How does the river corridor issue pertain to the Section 248(b)(5) floodways criterion?

13 A5. There is no direct relationship. Mr. Evans testifies that the Project “will not increase
14 flood elevations, velocities, or exacerbate fluvial erosion.” This means that the Project
15 will not have an undue adverse impact on floodways. This was the conclusion in my
16 direct testimony, where I explained that the Project is not located within a floodway or
17 floodway fringe, is approximately 900 feet away from the closest stream and 300 feet
18 from the mean high water mark of the Connecticut River. I also explained that the
19 Project will not change the natural condition of the waters or the lands adjacent to the
20 Connecticut River because the immediate area is already extensively developed and
21 includes critical infrastructure like the VELCO Vernon substation.

22

1 Q6. What evidence did the Agency of Natural Resources present on the Project's impacts on
2 floodways, streams, and shorelines?

3 A6. The Agency did not present any evidence on the Project's potential impacts on these
4 resources except the testimony from Mr. Evans pertaining to floodways and fluvial
5 erosion potential. As I said, Mr. Evans testifies that that the Project 'will not increase
6 flood elevations, velocities, or exacerbate fluvial erosion' (Evans at 8.)

7

8 Q7. How does the lack of a river corridor permit affect your conclusions about the Project's
9 impacts?

10 A7. It does not. The question of whether a river corridor permit is required is distinct from
11 the questions I addressed in my direct testimony regarding the Project's impact on the
12 Section 248(b)(5) criteria.

13

14 Q8. Does this conclude your testimony?

15 A8. Yes.