

# Vermont Yankee Petition for a Certificate of Public Good from Vermont Public Service Board

Communications Plan for Technical Hearing  
February 23-24, 2016

# Communications Plan

- Background

- On February 23 and February 24, the Vermont Public Service Board will be conducting the technical hearing for Docket No. 8300 seeking a Certificate of Public Good (CPG) authorizing the construction of a 2<sup>nd</sup> ISFSI pad and related improvements including installation of a new 200 kW diesel generator. Approval is expected in May, 2016
- Intervention was granted to New England Coalition, Windham Regional Planning Commission and the Town of Vernon.

# Communications Plan

## Goal

- Provide accurate information to media

# Communications Plan

- **Key Message**

*The PSB's April 26, 2006 order approving construction of the first Independent Spent Fuel Storage Installation (ISFSI) made clear that another ISFSI would be required in the future to hold all of Vermont Yankee's spent nuclear fuel. Entergy VY determined that the Project at the proposed location was superior to an ISFSI at any other location on the site. If the state permitting process goes as expected, crews will start transferring the spent fuel to dry cask storage in 2017 – two years earlier than initially planned – with all spent fuel transferred by the end of 2020.*

# Audience

## Media

- We will take a reactive posture to questions about PSB proceedings from the media and will not issue a news release.
- If asked, we will give 'Key Message': “. ”

# Audience

## Media – continued

Anticipated Questions	Answers
When will all fuel be transferred from pool to pad?	This proposal is for a second ISFSI pad to be constructed 30 feet to the west of the existing ISFSI beginning in mid-2016 to facilitate the completion of the transfer of all fuel from the spent fuel pool to the ISFSI by the end of 2020. In December 2015, ENVY announced plans to accelerate the initiation of the fuel transfer process by two years, beginning in 2017.
Will cost of transfer come out of NDT?	ENVY has committed to fund the construction of the second ISFSI pad as designed, procurement of dry storage systems and transfer of the fuel from the spent fuel pool to the ISFSI totaling approximately \$145 million from external credit lines, rather than from the Nuclear Decommissioning Trust Fund.
Were other sites considered for 2 <sup>nd</sup> pad?	ENVY considered several alternative locations for a second ISFSI elsewhere on the VY Station site, including making that second ISFSI a single consolidated storage site for all of VY's spent nuclear fuel (including the fuel now stored on the existing ISFSI pad). However, each of the other potential locations that were evaluated has distinct disadvantages, as compared to the current proposed location. In its pre-filed witness testimony in PSB Docket No. 8300, ENVY states those disadvantages include the potential for increased radiation dose to members of the public and additional aesthetic impacts to neighboring residential properties. In addition, ENVY notes that constructing an ISFSI at another location on the VY Station site would significantly delay the transfer of spent fuel from the spent fuel pool to dry cask storage beyond 2020.

# Audience - Media – continued

Anticipated Questions	Answers
<p>Were other sites considered for 2<sup>nd</sup> pad?</p>	<p>ENVY considered several alternative locations for a second ISFSI elsewhere on the VY Station site, including making that second ISFSI a single consolidated storage site for all of VY's spent nuclear fuel (including the fuel now stored on the existing ISFSI pad). However, each of the other potential locations that were evaluated has distinct disadvantages, as compared to the current proposed location. In its pre-filed witness testimony in PSB Docket No. 8300, ENVY states those disadvantages include the potential for increased radiation dose to members of the public and additional aesthetic impacts to neighboring residential properties. In addition, ENVY notes that constructing an ISFSI at another location on the VY Station site would significantly delay the transfer of spent fuel from the spent fuel pool to dry cask storage beyond 2020.</p>
<p>Has NRC accepted ENVY's plan?</p>	<p>On January 29, 2016, the U.S. Nuclear Regulatory Commission (NRC) issued a letter documenting its review of the Post Shutdown Decommissioning Activities Report (PSDAR) and Decommissioning Cost Estimate (DCE) submitted by ENVY. The PSDAR and DCE provided estimated dates for the initiation and completion of major decommissioning activities, including Preparations for Dormancy, Dormancy, Preparations for Decommissioning, Decommissioning, and Site Restoration. These estimated dates were based on various planning assumptions, including assumed dates concerning the removal of spent fuel from the Vermont Yankee site by the U.S. Department of Energy (DOE). After conducting a comprehensive review of the PSDAR and DCE, the NRC staff found, among other things, that: (1) ENVY had adequately described the activities associated with the major decommissioning periods; (2) ENVY's schedule for decommissioning activities is adequate to achieve VY license termination within 60 years of permanent cessation of operations, as required by NRC regulations; and (3) ENVY's DCE was reasonable.</p>

## Audience - Media – continued

Anticipated Questions	Answers
<p>What happens if decom or site restoration is unduly delayed beyond the schedule in ENVY PSDAR?</p>	<p>The presence of Dry Fuel Storage (DFS) casks in the proposed location will not inhibit demolition or restrict the methodologies available for demolishing the Reactor Building and/or structures adjacent to the stored spent fuel such that site restoration will be unduly delayed beyond the schedule provided in the Vermont Yankee PSDAR. Under NRC regulations, in the event the presence of the DFS casks will cause a significant delay in the commencement or completion of site restoration, ENVY, or any subsequent owner of the property, will be required to update the PSDAR and DCE as well, if there are resulting significant increased costs. ENVY or any subsequent owner of the property will be responsible for providing any additional funds needed to maintain the site consistent with applicable regulations in effect at the time, including, for example, funds from damages recovered from the U.S. Department of Energy.</p>

## For more information

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