

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Docket No. 8880

Joint Petition of NorthStar Decommissioning )  
Holdings, LLC, NorthStar Nuclear Decommissioning )  
Company, LLC, NorthStar Group Services, Inc., LVI )  
Parent Corporation, Northstar Group Holdings, LLC, )  
Entergy Nuclear Vermont Investment Company, )  
LLC, and Entergy Nuclear Operations, Inc., and any )  
other necessary affiliated entities to transfer )  
ownership of Entergy Nuclear Vermont Yankee, LLC )  
and for certain ancillary approvals, pursuant to 30 )  
V.S.A. §§ 107, 231, and 232 )

**SUMMARY OF PREFILED TESTIMONY OF BOB N. LEACH**

Mr. Leach's testimony presents an examination of several aspects of NorthStar's proposed decommissioning that are particularly important to the Town of Vernon.

Mr. Leach sponsors the following exhibits:

VRN-BNL-1	Resume of Bob N. Leach
VRN-BNL-2	Report

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**PREFILED TESTIMONY OF BOB N. LEACH**

1 Q1. Please state your name and occupation for the record.

2 A1. My name is Bob Leach. I am a resident of the Town of Brattleboro, currently retired. I  
3 was employed at nuclear power plants from 1969 until my retirement in 2008. I was  
4 employed by Vermont Yankee at the Vermont Yankee Nuclear Power Station from 1969  
5 to 1997 in the roles of Radiation Protection Manager, Chemistry and Health Physics  
6 Manager, Industrial Safety Director, and Certified Senior Reactor Operator. From 1997  
7 to 2008 I was employed at the Millstone Nuclear Power Station as a Senior Scientist,  
8 Licensing, and Staff Health Physicist. My resume is attached as Exhibit VRN-BNL-1.

9 Q2. On whose behalf are you testifying?

10 A2. The Town of Vernon Planning and Economic Development Commission.

11 Q3. What was the intended scope of your review of NorthStar's proposal?

12 A3. The scope of my review was to examine aspects of NorthStar's proposed  
13 decommissioning that are particularly important to the Town of Vernon. Specifically, the

1 use of rubbleization and the proposed radiological limits for the proposed unrestricted end  
2 use.

3 Q4. What documents did you review in preparing your assessment?

4 A4. I reviewed much of the prefiled testimony and many of the exhibits submitted by the  
5 Joint Petitioners, and conducted additional research, including review of federal  
6 regulations, and I discussed the proposed decommissioning with NorthStar employees  
7 David Pearson, Bill Reed, and Dan Jordan.

8 Q5. Have you prepared a report?

9 A5. Yes, this report is attached as Exhibit VRN-BNL-2.

10 Q6. What issues are presented by NorthStar's proposed decommissioning plan?

11 A6. I have concerns that if rubbleization is not used, the Town of Vernon will experience a  
12 significant increase in heavy truck traffic hauling out all the old concrete and hauling in  
13 new fill. This causes concerns relating to emissions, wear and tear on local roads, and  
14 noise. In particular, I am concerned about additional traffic hazards adjacent to the local  
15 Elementary School. NorthStar must be required to provide a comparison of truck traffic  
16 and quantify the potential benefits of avoiding those truck trips.

17 If rubbleization is employed, however, NorthStar will need to quantify the  
18 potential noise, dust and exhaust impacts from the rubbleization itself in accordance with  
19 VOSHA and other state regulations. NorthStar must be required to specifically quantify  
20 those potential impacts and potential mitigation for off-site impacts to nearby receptors in  
21 accordance with Vermont environmental regulations.

22 NorthStar has not yet developed the plan for evaluating the site at the end of the  
23 decommissioning process, and though the MARSSIM manual appears to be proposed as

1 a guideline to make measurements on the site, NorthStar will be monitored by the NRC  
2 to ensure direct radiological scanning and soil sampling is conducted. NorthStar will  
3 perform off-site sampling and / or scanning to develop data to use for “normal  
4 background” as outlined in the MARSSIM manual, and the NRC will monitor these  
5 activities. Normally soil samples will be taken as bore samples about 6” deep as the  
6 MARSSIM manual suggests this is the normal plow depth.

7 Also, potential impacts relating to non-radiological contaminants, including  
8 without limitation, PCBs, lead, mercury and asbestos, must be adequately investigated to  
9 ensure there is no offsite or on site pollution, by appropriate Vermont state agencies.

10 Q7. Does that conclude your testimony at this time?

11 A7. Yes.