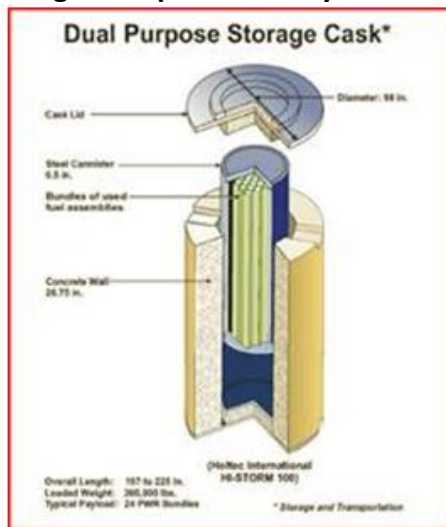


ARTICLE 11 - PILGRIM DECOMMISSIONING - SAFER SPENT FUEL STORAGE

Pilgrim's Spent Fuel Dry Casks



18' tall - Stored Vertically on a Concrete Pad



- By late 2021 or early 2022, all of Pilgrim's spent nuclear fuel will be stored onsite in 61 Holtec casks.
- There is no offsite repository. The spent fuel may be here indefinitely.
- Each cask contains 68 spent fuel assemblies, and ½ the total amount of Cesium-137 released at Chernobyl.
- Potential risks include corrosion leading to radiation leaks, insufficient monitoring and inspection of aging casks, and vulnerability to terrorist attack.

Corrosion/Cracks → Radiation Leaks

- Holtec's thin (0.5") stainless steel canisters of spent nuclear fuel are subject to defects and corrosion, exacerbated by salt air.
- Holtec admits stress corrosion cracking is "present to some degree in all spent fuel canisters," and the 21 years that Holtec casks have been in use "does not provide a definitive basis for conclusive canister performance for periods of time extending over a century."
- Holtec's 25-year warranty for its canisters is limited to manufacturing defects. It does not cover failure caused by corrosion, mishandling or any other reason. Pilgrim's casks are likely to be here for far longer than 25 years.

Monitoring and Inspection of Casks

- Holtec's plans to start inspecting casks – one cask - in 2034. Thereafter, Holtec says it will inspect one (1) cask (perhaps the same cask) every 5 years. The inspected cask does not have to be at Pilgrim; Holtec can inspect a cask at another site.
- Monitors used to inspect the outer wall of canister cannot determine the depth of a crack.

- Pilgrim's casks do not have real-time radiation, heat, or helium detectors. Onsite workers will use hand-held detectors, rely on radiation monitors elsewhere on the property, and look at the concrete overpack.
- We will not know that a cask or canister is leaking until after the fact.

Security Vulnerability



- The casks are located out in the open – the length of a football field from Rocky Hill Road - with 4-foot stone wall midway between the 18-ft casks and the road. There is no protective building or berm surrounding or shielding the casks. There are plans to plant arborvitae.
- According to the Massachusetts Attorney General's expert, Dr. Gordon Thompson, the canisters are vulnerable to trained attackers with weapons available today.

Fixes

There is no currently available technology to fix a cracked or leaking cask. The spent fuel pool will be demolished; placing a sealed metal canister or cask over a leaking cask would prevent needed convention cooling of the canister; hot or dry cells that could make it possible to move the fuel from a failing canister into a new one are not available.

Article 11's Requests to Increase Safety

To decrease risk, increase monitoring on each cask, linked to state, and increase inspections. In case of a leak, store spare overpacks onsite and a hot cell onsite, once developed and approved by NRC. Increase security by either erecting a high barrier around the dry cask pad to prevent line of sight attack, or store the casks inside a reinforced building.

Holtec's profit from decommissioning Pilgrim will be hundreds of millions of dollars. It can well afford to pay the relatively small expenses to protect us. Spent fuel management costs will come out of the Decommissioning Trust Fund, not Holtec's pocket. Holtec will be reimbursed for these expenses anyway by DOE due to the government's failure to take the fuel by 1998, as promised.