



Andrew Gottlieb
Executive Director

June 29, 2021

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Honorable Joanne M. Comerford, Senate Chair
Honorable Marjorie C. Decker, House Chair
Joint Committee on Public Health
State House
Boston, MA, 02133

RE: Support for H.2254 and S.1507

Dear Chair Comerford and Chair Decker:

The Association to Preserve Cape Cod (APCC) writes to you in support of **An Act to Add Section 5K(I) to Section 5K of Chapter 111 (H.2254)** and **An Act Relative to Monitoring Dry Casks of Spent Nuclear Fuel (S.1507)** and respectfully urges the Joint Committee on Public Health to report these bills out with a favorable recommendation.

Founded in 1968, APCC is the Cape Cod region’s leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect and enhance Cape Cod’s natural resources and quality of life.

APCC believes the provisions in H.2254 and S.1507 are necessary for helping to assure the continued protection of the health of citizens of the Commonwealth against hazards that may occur during the decommissioning of the Pilgrim Nuclear Power Station facility and storage of radioactive materials. These two bills would require the owner and operator of a nuclear power facility that stores spent nuclear fuel in dry casks to report to the Department of Public Health Radiation Control Division on the temperature of each dry cask and the rate of helium and radiation release from each cask. Monitoring would be conducted on a continuous basis.

Ongoing monitoring of the dry casks at Pilgrim is essential to quickly detect and address potential radiation leaks. Helium is used in the casks to prevent corrosion, conduct the heat that builds up within the casks from the spent fuel, and to prevent fires from occurring. The monitoring regime created by H.2254 and S.1507 would,

in a timely fashion, detect escaping helium, which is an indication of a crack in a cask and the release of radiation.

The casks are likely to remain in place outside at the Pilgrim facility for decades, if not indefinitely, since no national offsite storage currently exists. However, the dry casks in use at Pilgrim are designed for short term storage. The monitoring plans established by the Nuclear Regulatory Commission and Holtec are insufficient for protecting the public's health from potential exposure to escaping radiation from the storage casks. The current NRC-approved plan is to monitor just one cask out of the 62 beginning in 2034, when Pilgrim's oldest casks are 20 years old (the anticipated lifespan of the dry casks is between 25 and 30 years) and then every five years thereafter. The current routine cask monitoring only requires a visual check of the heat outlet vents.

It is clear that a more robust monitoring protocol is required that will provide immediate notice of a potential health risk from a cask leak. The provisions in H.2254 and S.1507 would establish the necessary procedure to help ensure that appropriate monitoring is conducted for the purpose of protecting the health of Massachusetts citizens. APCC requests that the Joint Committee on Public Health act quickly in advancing these bills.

Thank you for this opportunity to provide comment.

Sincerely,



Andrew Gottlieb
Executive Director

cc: Sen. Julian Cyr
Sen. Susan Moran
Rep. Sarah Peake
Rep. Timothy Whelan
Rep. Kip Diggs
Rep. David Vieira
Rep. Dylan Fernandes
Rep. Steven Xiarhos