



May 18, 2022

Andrew Gottlieb
Executive Director

The Honorable William Keating
2351 Rayburn HOB
United States House of Representatives
Washington, DC 20515

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RE: Environmental Analysis of Pilgrim Nuclear Power Station Wastewater

Dear Representative Keating:

On behalf of the Association to Preserve Cape Cod (APCC), the Cape Cod region’s leading nonprofit environmental advocacy and education organization, I wish to express our organization’s great appreciation for your commitment to ensuring that the Pilgrim Nuclear Power Station decommissioning process conducted by Holtec International is done safely and does not jeopardize the Cape’s marine environment or the health of our citizens. Specifically, we thank you for your leadership in pressing Holtec to agree to withhold the discharge of one million gallons of water used to cool the plant’s reactors and spent fuel rods until a third-party environmental expert has had the opportunity to conduct an analysis of the wastewater.

It is APCC’s strong belief that any analysis should not be limited to just determining the radiological levels present in the wastewater. The National Pollutant Discharge Elimination System (NPDES) Permit for the Pilgrim Nuclear Power Station (NPDES Permit No. MA0003557), re-issued in January 2020, specifies that any discharge by Holtec into Cape Cod Bay is explicitly prohibited by the discharge permit, unless there are no Clean Water Act-regulated pollutants present. The NPDES Permit specifically identifies the “discharge of pollutants in spent fuel pool water,” along with wastewater discharges from other sources associated with the decommissioning process, as being prohibited.¹

It is in the public’s interest to be made fully aware of all contaminants present in the water that is proposed to be discharged into Cape Cod Bay, not just radioactive contaminants. Given the very serious consequences if any harmful pollutants are

¹ February 17, 2022 letter from Kenneth Moraff, Director, EPA Region 1 Water Division, to Kelly Trice, Holtec Decommissioning International



released into the bay and adversely impact the marine environment, more assurances must be made than simply trusting that Holtec has done its due diligence in conducting its own analysis of the stored water.

Therefore, we respectfully request that the third-party environmental study of the Pilgrim plant's wastewater be broadened to include an analysis of pollutants regulated by Holtec's NPDES permit in addition to an analysis of the radiological levels present in the water. To demonstrate full transparency, we further recommend that the sampling protocol and parameters of such an analysis should be made available to the public prior to proceeding with the study.

It is only through a comprehensive analysis of the water used to cool the plant's reactors and spent fuel rods that the public can be adequately informed about all potential threats that may exist in discharging this water into Cape Cod Bay. We ask for your assistance in requiring that such a study be conducted.

Once again, thank you for your efforts to ensure that decommissioning of the Pilgrim Nuclear Power Station is done in a safe, responsible manner, and with full public engagement. Should you desire it, I would be happy to discuss this further with you or your staff.

Sincerely,



Andrew Gottlieb
Executive Director

cc: Chris Matthews
Andrew Nelson
Kenneth Moraff, EPA Region 1 Water Division