This needs to be clarified to make sure Vermont gets what it intended, and to avoid litigation of the issue down the road.

Q. Does the ENVY Decommissioning Plan restore the site to “greenfield status”?
A. If the definition of “greenfield status” is a decommissioned site that is restored to its original condition prior to any development, then, no, the Plan does not accomplish this because it calls for structures to be removed to a depth of 3 feet below grade. The 6545 MOU isn’t detailed enough so the Department believes specific conditions are needed to make clear what is required of Entergy upon decommissioning.

Q. What is involved if all structures are removed completely, rather than to three feet below grade?
A. Although no estimate has been provided in the Decommissioning Plan, an estimate is available from an Electric Power Research Institute (‘’EPRI’’) report entitled Maine Yankee Decommissioning Experience Report, Detailed Experiences 1997-2004. In this report, Maine Yankee estimated that removal of all sub-surface foundations beyond three feet below grade would have increased the total decommissioning project by approximately $100 million. Additional real costs in the form of increased risks of injury or death from additional deconstruction or transportation activities may arise. Whether these costs would hold true or not for Vermont Yankee is unknown, but it is likely the costs would
be significant, and they may not yield actual dose reduction benefits. Based on
Maine Yankee experiences, it is expected that removal of structures to three feet
below grade will allow the site to meet a 10mrem per year total dose effective
limit. This limit is sixty percent less than the NRC limit of 25 mrem per year; a
limit considered protective of public health by both the NRC and the
Environmental Protection Agency.

Q. Are there alternatives to the restoration of the site to its complete pre-development
state that can provide additional benefits to public health that are not provided for
in the Plan and would assist in defining exactly what Vermont wants in
decommissioning?

A. Yes. In the case of the decommissioning of the Maine Yankee Nuclear
Station, Maine Yankee agreed to an enhanced cleanup level of 10 mrem per year
through all pathways including within 4 mrem per year through the groundwater
pathway, as opposed to the NRC regulatory limits of 25 mrem per year from all
pathways including that from groundwater sources for drinking water. The Maine
Yankee site has been successfully cleaned-up to these more restrictive
radiological standards. In addition, both Massachusetts and Connecticut have
adopted decommissioning dose standards that are more restrictive than the
NRC’s.