



United States Department of the Interior

NATIONAL PARK SERVICE
Cape Cod National Seashore
Cape Cod National Seashore Advisory Commission
99 Marconi Site Road
Wellfleet, MA 02667

In reply refer to:
A18

February 24, 2017

U.S. Nuclear Regulatory Commission
Washington, D.C.
20555-0001

Re: Pilgrim Nuclear Power Facility

Dear Commissioners,

Since March 2012, the Cape Cod National Seashore Advisory Commission has been writing to your commission, or our Massachusetts governors, to express our collective concern about the continued operation of the Pilgrim Nuclear Power Station in Plymouth, Massachusetts. We have included several of our previous letters for your review.

In our initial letter of March 30, 2012 to your agency we expressed our concern about relicensing the aged and deteriorating 40-year-old facility, which we felt posed a threat to the citizens of our towns and to the 4-1/2 million tourists who visit our beautiful national park, *Cape Cod National Seashore*. We were disappointed to receive no response to our letter.

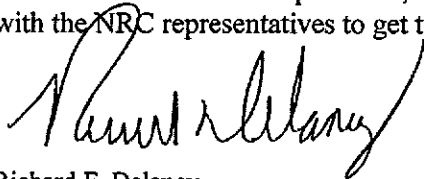
In 2015 your inspectors degraded the Pilgrim Nuclear Power Plant to one of the three worst operating nuclear facilities in the country, declaring it one step away from a shutdown. Since 2012 there have been myriad unplanned shutdowns due to equipment problems and poor maintenance. Last summer it was reported that fire watches were falsified, a very alarming situation. There is no cybersecurity plan and the post-Fukushima safety improvements suggested by your own engineers have not been made. Yet you continue to let Pilgrim operate as it limps and wheezes toward decommissioning in 2019.

In June 2016 we learned that there were no working back-up generators which would be critical in the loss of offsite electrical power. In July of last year, it was reported that the neutron absorbing boron panels which separate the overcrowded racked fuel assemblies in the fuel pool are degrading. This is especially concerning if you permit the planned refueling this year.

In December 2016, an email sent out by the chief of operation of the NRC's Northeast Region and received by Diane Turco, co-founder of *Cape Downwinders*, confirmed our fears. To quote from that email, "it appears that staff across the site may not have the standards to know what good actually is. The plant seems overwhelmed just trying to run the station"... the engineering group appears to be unprepared to answer all of the questions posed by the team"...and," We are observing current indications of a safety culture problem that a bunch of talking probably won't fix."

We ask, what will it take for you to shut this plant now and begin the decommissioning process? This facility poses a great threat to our environment and to public health and safety. We surely have had enough warning that Pilgrim is an accident waiting to happen.

As representatives from the six outer Cape towns of Provincetown, Truro, Wellfleet, Orleans, Chatham, Eastham; Barnstable County and the Governor of Massachusetts, we have felt that it is our responsibility to remain informed of the status of Pilgrim. A radiological release there would have a catastrophic impact on Cape Cod Bay, our towns, our citizens and visitors to Cape Cod National Seashore. In light of the recent email from the Chief of Operations, we feel more strongly than ever that we deserve to have a meeting with the NRC representatives to get the full report and express our concerns.



Richard F. Delaney
Chair, Cape Cod National Seashore Advisory Commission
Cape Cod National Seashore

Enclosure

cc:

MEMA
J. Forbes, Entergy
C. Bartlett, MDOPH
E. Edge, FEMA
Governor Baker
Rep. Keating
Rep. Peake
Sen. Markey
Sen. Warren
Sen. Cyr
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