

## **Questions for NDCAP Meeting on NorthStar**

Entergy is seeking state approval to transfer Vermont Yankee's license to NorthStar, a limited liability corporation which would assume all responsibility for the decommissioning and site release of the reactor. NorthStar would also assume responsibility for the guarding of the high-level radioactive waste that will remain onsite for an unknown period of time.

This transfer is a radical and controversial proposal that will set precedents for decommissioning procedures, high-level radioactive waste (HLRW) oversight and site release standards. There are many concerns regarding NorthStar's financial capacity as well as its cleanup expertise to assume responsibility for the major decommissioning of Vermont Yankee.

### **Financial Issues:**

- 1) Did Entergy seek bids from other decommissioning firms such as Energy Solutions to perform the decommissioning? If so, why did Entergy reject those bids?
- 2) Entergy (which was responsible for the cleanup of Maine Yankee) has stated that the Vermont Yankee decommissioning fund is inadequate to do a rapid cleanup of the site. If Entergy doesn't believe the fund is adequate, why should we believe NorthStar, a firm that has had no substantial experience in decommissioning a large-scale reactor?
- 3) NorthStar has committed additional revenues of \$125 million in a "support agreement" as well a \$25 million "letter of credit" (payable to a "secondary decommissioning completion trust") if it doesn't meet its deadlines. If these funds prove inadequate to complete cleanup, how does NorthStar intend to deal with financial short falls?
- 4) Why doesn't the purchase and sale agreement carryover all standing agreements between the State of Vermont and Entergy? What does NorthStar—in terms of decommissioning and guarding of the HLRW in the original agreement—object to?
- 5) Areva, a NorthStar partner, listed as having extensive decommissioning experience, is under investigation in France for falsifying documents as well as poor engineering. With Areva operating under a cloud, why is it a good partner rather than a liability?
- 6) Ground water contamination has been extensive at other decommissioning sites and as a result, clean-up costs have escalated. The Vermont Yankee site is known to have extensive radioactive groundwater contamination. How would NorthStar deal with escalating costs above and beyond its support agreement?

- 7) Given the fact that NorthStar hasn't engaged in any large scale decommissioning projects, what guarantee do we have that their financial assumptions are accurate or reasonable?
- 8) How does the DOJ lawsuit—stopping the merger of Energy Solutions and Waste Control Specialists (a NorthStar partner)—affect NorthStar and its partners? Both Areva and Waste Control Specialists are losing money. How might this impact VY's cleanup?
- 9) Does NorthStar expect that the Vermont Yankee site will be released for "unrestricted use"?
- 10) How many of the Vermont Yankee workers does NorthStar intend to retain for decommissioning activities?
- 11) What tax payments will NorthStar provide to the town of Vernon and to the state of Vermont to win state approval for the sale?
- 12) If NorthStar is unable to meet its commitments, will Entergy assume financial responsibility for any shortfalls?
- 13) If the VY site can't be released for unrestricted use, what are NorthStar's intentions for the use of the site?
- 14) NorthStar claims as an "asset" (in its NRC license transfer filing) an as yet unfiled lawsuit against the DOE to force the DOE to assume the costs of guarding the HLRW until the waste leaves the site. This amounts to \$5 million a year. If NorthStar is unsuccessful in its pursuit of this compensation, how will it cover the ongoing costs? (30 years amounts to \$150 million). Will it seek to utilize decommissioning trust fund assets to cover these costs?

### **Health and Safety Issues:**

- 15) Decommissioning exposes workers to highly radioactive components during cleanup. How does NorthStar intend to limit exposure during DECOM?
- 16) NorthStar intends to cut up the highly contaminated reactor internals. How will NorthStar protect the children in the elementary school across the street as well as the local families living in proximity to this industrial site during the cutting? Hot particles have been released during the cutting of internals at other sites.
- 17) How will Entergy ensure the protection of the children in the Vernon Elementary School as well as the surrounding community during the rapid transfer of the HLRW into dry cask storage?
- 18) Will Entergy and NorthStar commit to paying the costs of relocating the children in the elementary school to a safer location during fuel transfer and major decommissioning activities?
- 19) In terms of radioactive contamination, Massachusetts, Maine, New York and Colorado have a strict site-release standard. Will NorthStar commit to this stricter cleanup standard?