

No more subsidies to keep Pilgrim Nuclear running! (PLAC* petition to Massachusetts DEP)

TO: William Space, Massachusetts Department of Environmental Protection
Martin Suuberg, Commissioner, Massachusetts Department of Environmental Protection

I am writing to urge that the Massachusetts Department of Environmental Protection not reverse its Clean Energy Standard (CES) regulation which limits eligibility for clean energy credits only to newer generators.

Because of its abysmal record of poor maintenance, mechanical failures, safety and technical violations, as well as its grossly inadequate containment design (all problems which affect and threaten our environment), Massachusetts' sole nuclear power station, Pilgrim Nuclear Power Station (PNPS), should not be subsidized for operation beyond it's scheduled closure on May 31, 2019.

Radioactive emissions may not be addressed in the Global Warming Solutions Act, but they are relevant to the DEP's mission of environmental stewardship: "...to protect and enhance the Commonwealth's natural resources – air, water, land – and to provide for the health, safety, welfare and enjoyment of the people and the protection of their property". PNPS emits dozens of radionuclides into the air and water daily, all of them carcinogenic, and the National Academy of Sciences has established that there is no safe dose of radiation.

It is non-sensical to call nuclear energy "clean". On a bad day PNPS could render hundreds of square miles of land uninhabitable for generations to come. On good days it creates waste of unrivaled toxicity, for which no suitable storage method has been found after a half-century of production. That waste is a desirable target for terrorists, and a dirty bomb would wreak environmental havoc.

While the expanded Clean Energy Standard (CES-E) has the worthy goal of minimizing greenhouse gas emissions, the mining, refinement, enrichment and transport of the nuclear fuel used by PNPS do generate considerable greenhouse gasses, as will efforts to store its waste.

PNPS has been allowed to operate for over 20 years with an expired Cooling Water Intake Structure Permit (CWIS). Since a proper cooling structure would be a significant expense to Pilgrim's operator, this represents a subsidy paid largely by the environment:

During operation, PNPS extracts 510 million gallons of seawater daily from Cape Cod Bay, entraining, impinging, and killing thousands of marine organisms. PNPS releases chemicals which are introduced into its water waste stream as corrosion inhibitors and algae killers. In 2000 the Massachusetts Office of Coastal Zone Management reported: “Twenty-five years of data clearly show that millions of fish larva and eggs are destroyed by PNPS every year...” The The half-billion gallons of water is returned 30 degrees hotter, direct global warming which does not reconcile with the CES' broad goal of slowing the rate of global warming.

Giving clean energy credits to PNPS would not result in the generation of new clean energy. Instead, Entergy would sell the credits to coal, oil and gas powered generators, thus allowing those generators to continue emitting greenhouse gasses and thereby defeating the purpose of the CES.

ISO-NE reports there is over 14% reserve capacity in the New England Power Pool (NEPOOL), so we don't need PNPS's 2% capacity contribution (even on the hottest day of the summer with peak use of air conditioning). One of the oldest operating reactors in the nation, PNPS, with 2 other Entergy reactors, has occupied the bottom rung of the NRC's reactor oversight scorecard for several years. Its poorly maintained infrastructure will continue to be unreliable without major investment, and no operator is likely to pour money into it at this stage. Government-mandated, ratepayer-financed, subsidies-via-CECs may allow PNPS to continue operation, but there is no guarantee that it will even be a reliable generator, let alone a safe one.

Eleven states (including our Commonwealth and four others among the six within NEPOOL) have opposed a recent Federal Energy Commission proposal for new subsidies to nuclear and coal. I believe the following objections from that filing apply to MDEP's CES-E proposal as well:

The proposal (which could subsidize coal and nuclear) lacks factual and evidentiary basis; the timeline for considering the proposal prevents participants from commenting fully on the many complex issues raised by the proposal; the proposal fails to articulate a reasoned basis for its changes; the proposal is unnecessary to support system reliability; electric system reliability is adequate; further analysis of resilience and wholesale market changes are needed, not immediate regulatory intervention; other studies demonstrate that the focus on “baseload” resources and fuel supply is flawed; the proposal is not responsive to the circumstances of recent extreme weather events; experiences with clean energy development and the retirement of aging, uneconomic generation demonstrates there is no pressing reliability or resilience crisis; the proposal poses a serious threat of harm and

excessive costs for ratepayers; the proposal undermines state energy laws and policies; prolonging the life of coal-fired power plants will exacerbate the public health and environmental harms caused by such facilities.

When PNPS goes down, which it does frequently, no one's lights go out. We need not prop up polluting technologies, which includes Pilgrim. Pilgrim should close no later than May 31, 2019, and we should emphasize the development of truly green and sustainable sources such as solar, wind, hydro, storage, and tidal without heating Cape Cod Bay, or continuing the potential for devastating hazards. The Synapse report, commissioned by the Commonwealth in 2013, found that the Massachusetts Clean Energy Standard would accomplish the desired results if nuclear were not included to receive clean energy credits. That was sound advice in 2013 and it remains sound advice today.

Thank you for your consideration.

Signed by 215 people prior to MDEP's comment deadline of 12/1/17 and sent electronically from
change.org to climate.strategies@state.ma.us

* PLAC is Pilgrim Legislative Advisory Coalition plac-ma.org