

Pilgrim Legislative Advisory Coalition

P.O. Box 2712, Orleans MA 02653

Pilgrim Legislative Advisory Coalition comment on reducing greenhouse gas emissions under section 3(D) of the Global Warming Solutions Act

To climate.strategies@state.ma.us

Martin Suuberg, Commissioner MassDEP

Dear Commissioner Suuberg,

We represent the Pilgrim Legislative Advisory Coalition, a citizen's organization based on Cape Cod that works to protect the economic, environmental, health and safety interests of Massachusetts citizens through responsible public policy on nuclear energy. It serves the public interest on issues regarding the Pilgrim Nuclear Power Station specifically and on nuclear power in general.

Supporting Organizations

- Association to Preserve Cape Cod
- Cape Cod National Seashore Advisory Cttee
- Cape Downwinders Cooperative
- Pilgrim Watch
- Protect Our Cape Cod Aquifer
- Toxic Action Center (Boston)

Gratified by the decision made on August 11, 2016 on Clean Energy Standards, we do not support Pilgrim or any future nuclear reactors qualifying as eligible clean energy generators. The standard as currently written does not include generators that went online prior to December 31, 2010 in the CES, even if they meet the emissions-based threshold. However it is our understanding that DEP is now reconsidering a change in this decision. We believe this would be an unacceptable outcome for a number of reasons.

The nuclear industry is hard at work, especially the Entergy Corporation, owner of Pilgrim Nuclear Power Station. Were it to receive Clean Energy Credits, this aging and failing nuclear reactor could be sold and continue operating until 2032 under its current license. Nuclear reactors, being large units, would receive numerous credits which could then be sold to the dirtiest polluters enabling them to continue operating "business as usual", spewing carbon into the air. It makes little sense to establish an energy policy that ends up substituting one poison for another (carbon).

When developing a Clean Energy Standard, the particular details of the only nuclear generator in the Commonwealth must not be ignored. Pilgrim is the same failed design as the reactors at Fukushima, and one of the three worst performing nuclear reactors in the country. A number of months ago, a damning interim report on Pilgrim's safety status was released to the public by the NRC inspection team at Pilgrim. This interim assessment described, among other troubling findings, inadequate installation of new equipment,

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ongoing corrective action program problems, procedural non-compliance, poor maintenance, poor engineering practices, and equipment reliability problems. While independent nuclear experts believe Pilgrim should be closed immediately, at this time the NRC plans to allow Pilgrim to continue operating until its target closure date in June of 2019.

The MA DEP commissioned Synapse Energy Economics to prepare a report to assist in developing a Clean Energy Standard. Five key conclusions came from this report and concluded that the analysis showed that CES designed as load-serving-entities portfolio standard can serve as a viable, cost effective option for Massachusetts as long as windfall CEC payments are not made "to owners of resources such as nuclear and natural gas that will not contribute to new greenhouse gas emission reductions". Though these windfall payments made to nuclear facilities would reap profits for them, there would be no change in regional emissions but with one other very important outcome to customers....they would have utility bills grow by 4 percent by 2020 and 6 percent in 2030. This must be a part of the consideration if there were a change in CES because it involves the pocketbooks of all citizens of the Commonwealth.

In the Appendix to the 2015 Update of the Clean Energy and Climate Plan for 2020, the statement is made that the CES could also create a framework for other technologies that could meet the emissions threshold, including next-generation nuclear power. But meanwhile, there should be no room in the CES for a failing last-generation nuclear power generator such as Pilgrim. They have been receiving subsidies for too long, to the detriment of consumer prices, the environment and the development of truly clean energy alternatives which have been a hallmark for the Baker administration..

Nuclear power can only produce electricity. In the generation of that electricity, the building of those generators, the reactors, are never part of the discussion by the industry nor is much attention paid to the uranium mining, transportation and disposal of that waste that goes into that part of the production and end result. Mining uranium poses substantial threats to miners, local communities and the larger environment. Nuclear power plants are unique in their potential to cause catastrophic damage due to natural disasters, mechanical failure, human error, sabotage or terrorism. The industry would have us believe otherwise, but nuclear energy is far from clean.

For all the reasons described above, Pilgrim, designed using 60's technology, built in 1972 having acknowledged flaws and operating as one of three with the worst record on safety, should not receive CEC. From a public health perspective, we deserve better from our regulators.

In summary, the proposed language for 310 CMR 7.75 defines Non-emitting Electricity Generators as those powered by hydro, nuclear, ocean, solar or wind power. Inclusion

of nuclear as a non-emitting generator will have no effect on reducing emissions, will result in windfall profits for the nuclear generator licensee, and will result in significant increases in ratepayers' electric bills. It will allow the generation of greenhouse gases from the processing and transport of nuclear fuel to continue, and will allow the Pilgrim Nuclear Power Station, one of the three nuclear generators in the country with the worst safety records, to continue to imperil the population and environment of Eastern Massachusetts while it sells its clean energy credit to other dirty polluters. And it will further delay the transition to TRULY clean energy sources: hydro, ocean, solar and wind. Massachusetts has built on its reputation as a leader in green energy; please don't make a decision that will move further away from the goals that have been wisely set forth up until now. We are seeing extremely disappointing practices on the Federal level, Mass can continue to do the right, the best thing for the citizens of the Commonwealth.....again. Reject a change in our CES.

Respectfully submitted,

Pilgrim Legislative Advisory Coalition

Coordinating Committee

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