



June 14, 2017

Honorable John Shimkus
Chairman
Subcommittee on Environment
Committee on Energy and Commerce
U.S. House of Representatives
Washington, DC 20515

Honorable Paul Tonko
Ranking Member
Subcommittee on Environment
Committee on Energy and Commerce
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Shimkus and Ranking Member Tonko:

On behalf of the Decommissioning Plant Coalition (DPC)¹, I write to express our appreciation for your leadership and the Subcommittee's efforts to address the obvious shortcomings in the Nation's program for the management of spent nuclear fuel (SNF) and high-level radioactive waste (HLW). Our member companies all represent sites where nuclear power plants once produced important baseload electricity, where all reactors at those sites have permanently ceased commercial operation, and where important work related to the decommissioning of those facilities is underway. At some of our sites, all decommissioning work has been completed and the sites are available for repurposing but for the government's failure to timely accept title and transfer the SNF and HLW to a facility for consolidated management and disposal.

During the Subcommittee's hearing of May 15, 2015, the DPC offered testimony in support of further action on the Yucca Mountain license application and for the establishment of a consolidated interim storage program that prioritized the removal of the SNF and related material from permanently closed shutdown sites. While not repeating that testimony here, which is a part of your hearing record, we have taken the liberty of enclosing a copy of the principles that guide our response to legislative proposals such as the Discussion Draft of April 19, 2017, titled the "Nuclear Waste Policy Amendments Act of 2017."

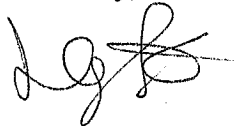
¹ The DPC was established in 2001 out of the recognition that the overwhelming attention of the regulator, the industry and policy makers would be focused on the operating fleet and provides a forum for the identification of federal policy and regulatory issues of unique or special concern to decommissioning civilian nuclear facilities. Since its inception, plants that have been represented in the work of the DPC include: Big Rock (MI), Connecticut Yankee (CT), Crystal River (FL), Humboldt Bay (CA), LaCrosse (WI), Maine Yankee (ME), Rancho Seco (CA), San Onofre (CA), Vermont Yankee (VT), Yankee Rowe (MA), and Zion (IL).

We appreciate those provisions of the Discussion Draft that would move the Yucca Mountain licensing effort forward and that authorize the Secretary to initiate efforts aimed at the establishment of monitored retrievable storage as an adjunct of the repository program. We are concerned, however, that the current "linkage" between the interim storage program and licensing activities aimed at achieving an "up or down" decision on the DOE Yucca Mountain application could unreasonably delay the government's fulfillment of its contractual obligation to remove SNF and HLW from our sites. As Mr. Ronningen noted in his testimony two years ago, the resource requirements and other challenges facing the Department's effort to attain a position where it can begin moving this material to Yucca Mountain is "not likely to be accomplished in time frames that meet the equity interests of our host communities."

We continue our strong support for moving forward on the licensing effort for the proposed Yucca Mountain repository, but also strongly encourage consideration of ways to move forward on a pilot project for the consolidated storage of the SNF and HLW at our sites. We believe both can and must be accomplished.

We thank you for your past efforts to include the views of the DPC in your deliberations and we look forward to working with you in a constructive spirit on this, and other related issues, as this important legislative initiative moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Norton", with a stylized flourish at the end.

Wayne Norton
Chairman
DPC Steering Committee

Enclosure: As stated

Cc: Members, Subcommittee on Environment



Position Statement
Decommissioning Plant Coalition
Spent Fuel Management Program

- The Administration and Congress should support funding sufficient to resume the Yucca Mountain licensing proceeding to allow for the adjudication of technical issues raised by the State of Nevada and other stakeholders.
- The Administration and Congress should immediately take the steps necessary to advance the development of one or more pilot projects (private or public) that would provide consolidated interim storage (CIS) for spent nuclear fuel (SNF) and Greater-Than-Class-C (GTCC) waste from sites where nuclear power generating activities have permanently ceased.
- The Department of Energy should complete its ongoing evaluation of the existing infrastructure at permanently shutdown plant sites and, in conjunction with those contract holders, develop and implement a planning process that will allow for the timely and orderly removal of the SNF and GTCC waste at each.
- The Department of Energy should fund regional transportation planning efforts envisioned by the Nuclear Waste Policy Act and begin the procurement of rolling stock, transportation casks and other support equipment necessary for the acceptance and transportation of SNF and GTCC waste from permanently shutdown plant sites.
- The Administration and the Congress should reform the federal budgetary treatment of the Nuclear Waste Fund (NWF) so that monies already collected, as well as interest and other receivables credited to the NWF, are available as needed for the Yucca Mountain adjudication and the timely implementation of the pilot CIS program.