

## NorthStar Testimony on H.740

### Testimony

Thank you for the opportunity to testify on H.740, including the additional language on annual funding of the NDCAP presented last week by Commissioner Tierney.

NorthStar has been actively engaged with the citizens advisory panel during the PUC review and approval of NorthStar's decommissioning plan for Vermont Yankee and throughout the decommissioning process as we have been implementing that plan. NorthStar representatives provide NDCAP with regular updates about our progress toward safely and efficiently restoring the Vermont Yankee site and answer questions posed by panel members and the public. As a result, NorthStar understands and appreciates the role NDCAP plays in advising state regulators who oversee our decommissioning efforts and gathering input from and providing information to the public.

NorthStar also appreciates the open dialogue with State agency representatives, local legislative leaders, and citizen panelists that resulted in consensus around NorthStar contributing to funding obligations for the Nuclear Decommissioning Citizens Advisory Panel. The annual funding amount proposed is based on an analysis by Department of Public Service of NDCAP costs incurred between fiscal years 2014-2019 and a consultation that Representatives Sibilia and Coffey, who are both co-sponsors of the bill and members of the

NDCAP, had with the Institute for Nuclear Host Communities regarding potential future needs of the panel as decommissioning progresses. Thus, the \$35,000 in annual funding proposed in the bill was chosen carefully to ensure that NorthStar would fully cover amounts the Panel has spent historically while leaving a substantial balance for other appropriate expenses for administrative and technical resources that the Panel may require to fulfill its role in the decommissioning process.

For context, this amount is separate from and over and above the money NorthStar reimburses to the State of Vermont for legal and expert technical resources the state has contracted as part of the PUC review and approval process and ongoing oversight of our decommissioning efforts. To-date, NorthStar has paid \$2,561,469.47 under the state's bill-back authority. Of that total, \$163,479.05 and counting has covered expenses for the state's consultants, including Four Points, who assist the Department of Public Service in reviewing NorthStar's monthly reports. The consultants assist the Department in overseeing the scope of work NorthStar's team performed, the schedule at which work is progressing, and how actual decommissioning expenses compare to budget projections. This amount also includes costs for ATC, the consultant retained by the Agency of Natural Resources in connection with ANR's oversight of the site restoration work at Vermont Yankee.

It is also important to note that, in addition to regular information sharing with the NDCAP, NorthStar has conducted multiple tours of the plant for local officials and for members of the media, and also has made multiple public presentations to

officials of the Town of Vernon. The NDCAP is an important, but by no means the only, venue through which Vermonters obtain information from and provide input to NorthStar.

NorthStar also appreciates the consensus among the Panel's membership to conclude the funding obligation upon NorthStar's submission to the NRC of the application for Partial License Termination. This is a logical endpoint. At this stage, the work of decommissioning all but the spent fuel installation will be complete. The only personnel remaining on site will be primarily the security force monitoring the spent fuel. Conditions on the site will have been tested and monitored, with oversight from Vermont regulators, including the Departments of Public Service, Environmental Conservation, and Health, to ensure that the site complies with agreed-upon health and safety indicators and is ready for productive economic use once again.

Based on the reasonable annual amount of NorthStar's funding obligation and the logical, but limited time-horizon of that obligation, NorthStar can support H.740 as it has been presented to you. Thank you for the opportunity for NorthStar to present views on the legislation as part of your record.