



Vermont Department of Environmental Conservation

Commissioner's Office

103 South Main Street, 1 South [phone] 802-241-3808
Waterbury, VT 05671-0401 [fax] 802-244-5141

Agency of Natural Resources

March 27, 2011

Christopher J. Wamser
Entergy Nuclear/Vermont Yankee
PO Box 250
320 Governor Hunt Road
Vernon, Vermont 05354-9766

Dear Mr. Wamser:

Thank you for your letter dated January 20, 2012 concerning sampling of groundwater from the Construction Office Building (COB) well.

Your letter states that, "To the extent that you request such testing to collect additional information, traditional well sampling methods would require withdrawing significant quantities of water from the well, which could pose a risk of contaminating the bedrock aquifer." You believe that taking a grab sample from within the well column would cause mixing within the well column. You also state that this testing would, "not add meaningful new information about the nature and extent of tritium in the subsurface or add to the understanding of groundwater movement down gradient of the plant."

We respectfully disagree with your conclusions concerning sampling of the COB well and request that ENVY reconsider its position in this matter. All groundwater within the State of Vermont is considered a potential drinking water source and therefore should be protected. The COB well is the only sampling port into the bedrock aquifer that can be used to substantiate the Site Conceptual Model's (SCM) conclusion that tritium contaminated groundwater should not flow into the bedrock aquifer. Since the bedrock aquifer is the aquifer used for potable water in the Vernon area, this is the aquifer of greatest concern. Obtaining empirical data that supports the SCM claim that groundwater is flowing from the bedrock aquifer into the overburden aquifer is an important validation of the SCM. Knowing that the bedrock aquifer definitely is not impacted with tritium allays many concerns with drinking water wells in this part of the Connecticut River valley. This is particularly true given the seemingly anomalous result in October 2010 showing tritium in a sample from that well.

We continue to believe that obtaining a grab sample is appropriate for this well, and would not cause any undue risk to the bedrock aquifer, particularly if only a few gallons are removed as is the case in grab sampling. We have checked with both EPA's Office of Groundwater and Drinking Water and National Air and Radiation Environmental Laboratory and both agree that taking a grab sample from a well for tritium is an appropriate sampling technique for this analyte. We could arrange for your scientists to speak with them as well. Placing a sampling apparatus into the COB would cause little to no mixing of the groundwater from the tritium contaminated overburden aquifer. We believe that obtaining a sample from the only sampling point into the bedrock aquifer would add meaningful new information about the nature and extent of tritium in the subsurface and add to the understanding of groundwater movement under the plant. We therefore respectfully request that ENVY reconsider its position on sampling the

COB and begin to obtain routine (monthly) samples from the COB well for analysis of tritium and other radionuclides. The Department of Health should be provided a one gallon split of the monthly sample for their own analysis. Thank you for considering this request. We look forward to see the results of this sampling.

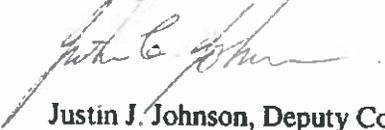
Sincerely,



Elizabeth H. Miller, Commissioner
Department of Public Service



Harry Chen, Commissioner
Department of Health



Justin J. Johnson, Deputy Commissioner
Department of Environmental Conservation