

EDO Principal Correspondence Control

FROM: DUE: / /

EDO CONTROL: G20000497  
DOC DT: 10/14/00  
FINAL REPLY:

Ernest Goitein  
Atherton, California

TO:

Norry, DEDM

FOR SIGNATURE OF :

\*\* GRN \*\*

CRC NO: 00-0643

DESC:

GEIS for License Renewal of Nuclear Plants  
(NUREG-1437, Vol. 1)

ROUTING:

Travers  
Paperiello  
Miraglia  
Norry  
Craig  
Burns/Cyr  
Springer, ADM

DATE: 10/19/00

ASSIGNED TO:

NRR

CONTACT:

Collins

SPECIAL INSTRUCTIONS OR REMARKS:

For Appropriate Action.

**OFFICE OF THE SECRETARY  
CORRESPONDENCE CONTROL TICKET**

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**ACTION OFFICE:** EDO

**AUTHOR:** ERNEST YOITEIN  
**AFFILIATION:** CA  
**ADDRESSEE:** PATRICIA NORRY  
**SUBJECT:** GEIS FOR LICENSE RENEWAL OF NUCLEAR PLANTS (NUREG-1437 VOL. 1)

**ACTION:** Appropriate  
**DISTRIBUTION:** RF

**LETTER DATE:** 10/14/2000  
**ACKNOWLEDGED:** No  
**SPECIAL HANDLING:**

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EDO --G20000497

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October 14, 2000

Patricia Norry, Director  
Rules and Directives Branch  
Division of Administrative Services  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: GEIS for License Renewal of Nuclear Plants (NUREG-1437 Vol. 1)

Dear Director Norry,

I am sorry that regional hearings have not been held on this important issue of a Generic 20 Year Relicensing Plan. I am sure you would agree that public input and understanding is critical to establish confidence in the NRC's role as regulator of the nuclear power industry. I urge that the NRC extend the public comment period and arrange for future regional public hearings.

A blanket Generic Plan does not consider the unique site specific conditions, operating history, newly discovered geologic conditions, newly realized environmental impacts, management competence, and economic considerations.

I therefore oppose a generic license extension plan for the following reasons:

- The spent fuel generated during these twenty years has no place to go. Even if Yucca Mt. is approved as a repository, Yucca Mt. would be filled by the spent fuel from the current generation of nuclear power plants. How does the Generic Relicensing plan address this issue? Who would pay for the storage of the spent fuel generated during these 20 years? Has this been considered in the economic analysis?
- In several plants the number of scrams could have stressed critical components of the primary circuit. Without plant specific analysis, how would a Generic Relicensing plan determine that the stresses and thermal shocks imposed by future scrams will not result in failure?
- Chemical decontamination of piping, - necessary to reduce ambient radiation levels so that the required In Service Inspection program and plant maintenance can be performed, - can result in stress corrosion cracking. Has the Generic Relicensing plan established a program to evaluate stress corrosion cracking potential?
- In the last thirty years the population densities have drastically changed. Consequently evacuation plans, once approved, may no longer be valid. Site specific analysis of the emergency evacuation procedures is required before any relicensing is considered.

