

H17 Green Ticket 497

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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.

ADM03

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Add Steve Koenick

SSK2

Raj Anand RKA

Template ADM 013

• Fish kills at unacceptable levels have been observed at several plants. (San Onofre, Salem, etc.) Will the Generic Relicensing plan require changes in plant design to avoid environmental damage?

• New faults or extension of existing faults have been mapped since plants were first licensed. This requires a new Design Basis Earthquake (DBE) (WPPSS #2?) How would Generic Licensing be able to accommodate an increased DBE?

• Steam generator tube failures are on the increase after 20-26 years of operation. The potential for circumferential tube failure and consequent rupture of many tubes is of concern (example: Mihama, Japan). A twenty year license extension would make the steam generators increasingly vulnerable to this type of failure. How would the GEIS address this concern?

• Brackets supporting the internal shield and baffles in BWR reactor vessels are cracking. How can the NRC approve a license extension without plant specific review?

• The modulus of elasticity of concrete changes with age. The seismic calculations for pipe supports and electric cable tray supports for class 1 systems may no longer be correct, especially at higher elevations, when revised response spectra are used. How would a generic licensing plan account for this?

I hope you will abandon the flawed concept of generic licensing. I look forward to your reply to the above concerns.

Sincerely,

A handwritten signature in black ink, reading "Ernest Goitein". The signature is written in a cursive, flowing style with a large initial 'E'.

cc NRC Chairman Richard Meserve