

EDO Principal Correspondence Control

FROM: DUE: 05/21/01 EDO CONTROL: G20010136  
DOC DT: 03/21/01  
FINAL REPLY:

Norm Cohen  
UNPLUG Salem Campaign

TO:

Collins, NRR

FOR SIGNATURE OF : \*\* GRN \*\*

CRC NO:

Collins, NRR

DESC:

ROUTING:

Salem 1 and 2

Travers  
Paperiello  
Kane  
Norry  
Reiter  
Craig  
Burns/Cyr  
Miller, RI  
Caputo, OI  
Congel, OE

DATE: 04/09/01

ASSIGNED TO: CONTACT:  
NRR Collins

SPECIAL INSTRUCTIONS OR REMARKS:

Ref. G20000554 and G20010014.

The UNPLUG SALEM Campaign  
21 Barr Ave., Linwood NJ 08221  
609-601-8583/601-8537; ncohen12@home.com  
<http://www.unplugsalem.org/>

Date: 3/21/01

To: Samuel J Collins,  
Director, Office of NRR  
11155 Rockville Pike  
Rockville Md., 20852-2738

From: Norm Cohen  
Coordinator, UNPLUG Salem Campaign

Dear Mr. Collins,

Thank you for your lengthy letter of February 23<sup>rd</sup>, 2001, which responded to our letters of 11/24/2000 and 1/6/2001, which were sent to Chairman Meserve. I appreciate the effort that went into your response to our letters, and for the amount of information contained in them.

This letter is in response to several items in your letter. First I want to share comments and requests made from our Technical Committee: Responses of the Technical Committee of the UNPLUG Salem Campaign:

"First page: ADAMS is really slow and virtually impossible to navigate. The NRC page is the worst compared to many other government agencies using ADAMS. Also ADAMS does not contain the real *nitty gritty*: certifications, heat treatment data like Charpy tests and hardness data. Without this information any statement of the licensee and the NRC is unchallengeable.

Page 2: This whole letter is very presumptuous and operates on the premise that the industry and the NRC viewpoints are all that exist. The Hopensfeld Differing Professional Opinion is not referenced. Are you afraid of differing opinions that are probably going to turn out to be the truth, and legitimate concerns as referenced to Salem? We respectfully point out that the Hopensfeld DPO and UNPLUG Salem's concerns are very similar. They are, in fact, almost identical. There was no scientific collaboration, just two minds operating independently with data and known operating facts.

Salem Steam Generators: This is another example of the "management" mindset of the PSE&G and NRC, which tries to pass itself off on the premise: WE will worry about details when the NRC tells us to. At this point, it is intuitively obvious that they'll do nothing until the fox has eaten all the hens. You are

allowing the wrong people to monitor themselves. It is not even logical to presume that they'll own up to anything. Historically, they have NOT done so.

Salem Unit 2: When we cannot agree that what caused the tubing failure and rate of tubing failure, we do not understand how any changes in alloy has benefited ANYTHING in the area of avoiding future tube cracks. Perhaps the NRC and the Licensee is blessed, but we have had to know what is the problem in order to repair it. Whether you like it or not, the NRC and the PSEG people have really avoided answering the questions regarding the levels of impurities and their impact on the integrity of the tubing's metallurgical properties. While the gross contaminants are removed, it is now a question of the effects of seemingly innocuous chemical species remaining after "their improved water quality program" at the conditions that exist during full-scale operations on the Alloy 600.

Alloy 600 was a poor choice for the replacement Steam Generators because PSE&G tried to cut corners to save a few dollars. The implication here, Mr. Collins and NRC staffers, is: if PSE&G has chosen to cut corners on this major change, and we all know that the Operation and Management costs are always being reduced wherever possible, then is it not logical that PSE&G will continue to cut corners everywhere else including the public's ultimate safety? We think that it is a logical conclusion based on their past bad behavior. AND, NOW Hope Creek is on its lowest rating before shutdown? Who's trying to kid whom???

Chemical cleaning is nice, but does it really attack a problem that we do not agree on the cause thereof? Also chemical cleaning comes with its own set of problems. Have these been addressed?

One of PSE&G's former staff, now an advisor to our Technical Committee, wrote papers for EPRI and was recognized as an expert in this area of power boiler operations on the processes of chemical cleaning. He has told us that to have removed the copper-bearing wastes would have required a chelant in the ammoniacal form and a temperature in excess of 300 F under pressure to ensure the removal of most of the material. This requires time- and, if they did it without pressure, and only a slightly elevated temperature, then, the cleaning was probably NOT effective; and CERTAINLY NOT complete!! In addition, the wastes were probably at some level of radioactivity. Where were they sent?

Furthermore, chemical cleanings do not remove the root cause, rather, they are like aspirins, they alleviate the pain of a headache, but not the ultimate cause of the headaches

NRC admits that the paperwork, certifications, lab books, procedure manuals, exist for heat treatment and chemistry and others are proprietary to the licensee and that they cannot supply them. This is quite disturbing. We do not believe NRC can do its job without reference to this paper trail, but no one can determine the adequacy of the repair without access to this paper trail. Mr. Collins! Can you honestly say that the NRC does NOT have a right to review that data? If, indeed, sir, PSE&G is operating a facility that

has a potentially negative impact on the general public, then it is logically incumbent upon the responsible agency to do a full review AND make that available to the public. When it comes to the public safety- there "ain't" no such thing as "proprietary information". Maybe Westinghouse Electric Corporation data needs to be subpoenaed?

We suggest that the NRC and the Licensee audit the site with our experts. At that time we should be given access to all their paperwork that we are kept out of now. Mr. Collins, on our staff are many former nuclear scientists/engineers and we/they'd like to review the data that the "licensee" deems "proprietary". Does this have to come to a lawsuit demanding that the data be made public? Especially when, in reality, most, if not all, have probably been presented either at various scientific meetings such as the Pittsburgh Water Conference or at the various Edison Electric Institute Chemistry Meetings? After all, Westinghouse likes to toot its own horn.

Again, Without Charpy tests and hardnesses, anyone can say anything about the heat treatment. Without certifications, anyone can say the heat treatment was done when it wasn't. Without exposure tests, anyone can say anything about the corrosion resistance. Without coupons in the actual conditions, anyone can say anything about anything. Of course they can also 'generate' the paperwork. One of our committee members was involved in "pencil-whipping" an issue at Salem and refused to do so; however, under the premise of a veiled threat to his livelihood, he did not utilize the so-called "whistle-blower" protection that the NRC is supposed to provide for these types of safety issues. Ask Mr. Gatani how he made out after speaking out accurately on a safety issue. We must have this data to learn if PSE&G is telling the technical truth for once.

Everything that we said about the heat treatment goes double for the water chemistry and valves and grease. Also we do not know any other way except coupons to check for erosion. Yes that is 'erosion', not corrosion. There are other ways but we are not familiar or comfortable with them. While "in-situ" coupons are a good idea, PSEG balked big time when one of our committee, while still employed by PSE&G, suggested this be done. Since that time, the water chemistry has NOT been improved. If PSE&G is still using the AVT- a mixture of ammonia and hydrazine, then, they have done nothing since our committee member left PSE&G. Furthermore, if they have not reduced the level of the innocuous ions present even after the polishing step like other nuclear facilities have done, then whatever "chemistry" that is taking place on the surfaces of these stressed tubes has not changed and will predictably shorten the life of the Steam Generators. Better that they had spent the money on the Alloy 690.

We still do not have lot numbers of the alloy. Essentially the last paragraph of the first page of the NRC letter says it all: it is the responsibility of the licensee. Without some paperwork NRC can decide or 'find'

anything. Everything that the NRC says may or may not be true. We need the certifications, and/or access to lab books and procedure manuals and workers. Mr. Collins, in our collective opinion, this smacks of PSEG trying once again to hide things from public scrutiny. If PSE&G is really interested in maintaining a safe operation and do not have anything to hide, then the data should be made available to us. You see, sir, we have many very knowledgeable people who can, review and comprehend this data.

Further if there is an improvement we cannot say it will be sufficient. Surely a lab technician can always ignore the pH long enough to start a problem. Surely if water treatment was bad enough in the past to cause erosion and corrosion, water treatment can get worse in the future despite better alloys and water chemistry. Without a look at procedure manuals worse is allowed and maybe promoted. (submitted by the UNPLUG Salem Technical Committee)

With the above comments in mind, below are additional comments from the Steering Committee of the UNPLUG Salem Campaign. We are responding page by page to your letter, and expect that you will do the same. This letter has been reviewed and authorized by the Steering Committee of the UNPLUG Salem Campaign.

- (1) On page two of ~~your~~ letter you offer to meet with us at the upcoming licensee assessment meeting this summer. We hereby request such a meeting, provided that this meeting is open to the public, and is recorded for the record, and that a transcript of this meeting be placed on the NRC website. We suggest a meeting format similar to the roundtable meeting that was held last year in Pennsville. We suggest that among the people invited to sit at the table would be representatives from the UNPLUG Salem Campaign, including our experts on steam generators, Jill Lipoti of the NJDEP, Dr Hopenfeld, NRC inspectors, David Lochbaum, Jim Riccio, Ray Shadis, and PSE&G representatives who are responsible for the steam generator program. Opportunity should be made at this meeting for questions and interactions from audience members not at the table. Under no circumstances would we approve of any closed door, private meeting.
- (2) As the watchdog~~holder~~ for Salem, the UNPLUG Campaign would like to take a more active role in the actual assessment process. This could be briefings, tours and actual examples of how NRC assesses a nuclear plant.
- (3) Diane Scernci, ~~in~~ email in January, stated that "there are no coupons" at Salem. How do you measure degradation without coupons, and why were

these NOT installed?

- (4) On page one of ~~Enclosure~~, you state that, "the responsibility for performing the comprehensive steam generator examination and the full interpretation of the data remains with the licensee." Isn't this the definition of the "Fox Guarding the Henhouse"? Is there at least a team of trained NRC specialists who go to troubled reactors and do their own inspections? If not, why not?
- (5) Enclosure, page ~~2~~<sup>4</sup> Do you now have the 2000 annual report? If so, can you send us a copy, and what does this report indicate as far as continued steam generator degradation? If the report is not yet issued, why not, and when will it be available? Please do NOT quote ADAMS as a source. That is a waste of everyone's time. NRC admits so as well.
- (6) Enclosure, page ~~6~~: Does the release of the ACRS report on Hopenfeld's DPO change any of your statements and conclusions reached in this section? If not, why not? With the ACRS report in mind, do you stand behind the last paragraph on page 5, or do you wish to re-think these comments?
- (7) On page 6, you ~~see~~ downplay the Inspector General's report on Indian Point Unit 2 and NRC's role in the accident. Does this mean that the IG has no Authority in the NRC? Your paragraph 3 on page 7 tries to go two ways: to ignore the IG's report and then to "take it seriously". Which one did you mean? If the IG has no standing or respect at the NRC, to whom do we turn to "watch the watchers"? It would be as though a police department ignored a report from Internal Affairs.
- (8) On pages 7 and ~~8~~, ~~imply~~ that we did not send additional information on water chemistry, lubricants and snubbers. This information was indeed supplied to you when we obtained copies of the whistleblower letters sent to NRC in 1997. You say that on 1/16/2001, we sent "excerpts" of the whistleblower letters. We did NOT send 'excerpts", we sent you ENTIRE letters with nothing omitted. The writer of these letters has told us that all of his concerns on water chemistry, steam generators and lubrication have NOT been met by NRC, and his 1997 concerns remain even more valid and urgent today. You ask for "new" information. How do you expect us to provide "new" information when NRC and PSE&G control all information?

(9) Is there some~~one~~ that the author of these letters can testify to the NRC while retaining his anonymity? He is an expert in the areas of steam generators and water chemistry.

(10) On page 8 you defend the use of alloy 600 instead of 690. With the ACRS report in mind, do you still feel that allowing 600 is safe?

(11) On page 9, paragraph (b) you claim that we said that Salem's Limatorque grease "failed". If you review the documents from the whistleblower's 1997 letter, what he is saying is that there is a danger of the grease separating. Your last line in paragraph (b) supports that contention. You say, "there 'may' have been occurrences." So were there occurrences or not? If so, how many? The point of the letter writer is that because PSE&G is NOT using the best grease it could, safety is compromised. We would also like to see a copy of your 'review' so that our expert can review it for himself.

(12) Paragraph (d) is extremely troubling, as pointed out by our Technical Committee. We believe that NRC is shirking it's regulatory duty by not requiring this information to be provided to them. While one might argue that the manuals might contain "trade secrets", that argument does not apply to copies of laboratory certificates. We feel that the public and the NRC are entitled to see this information. We therefore renew our request that NRC obtain this information. We are open to discussion as to how that information would be provided to our Technical Committee.

(13) We disagree with item (7) on page 9. Your risk-informed process does NOT have a way for these kind of allegations to impact the color codes on the website. This could be changed by adding an additional block that looks at employee allegations and turn-overs. The recent resignations at IP2, for example, would be at least a "White" under that schema.

We look forward to answers to these additional questions and contentions. We especially look for a quick arrangement on the meeting this summer and on our access to necessary safety data.

Sincerely,

Norm Cohen

Coordinator, UNPLUG Salem Campaign

CC: Jill Lipoti, NJDEP

Richard Merserve, Chair, NRC

Congressman Frank Lobiondo

UNPLUG SALEM and STOP THE SALEM FISH SLAUGHTER CAMPAIGNS (as of  
2/01):

Affordable Housing Network; Alliance for a Living Ocean (fish campaign only); Albright Environmental Alliance; American Littoral Society (fish campaign only); Asian American Political Coalition; Atlantic Area Friends Meeting; Anne Arundel Peace Action; Big Sky Packgoat Club; Brandywine Peace Community; Bucks County Socialist Party; Camden County Green Party; CAN (Citizens Awareness Network); CAPE (Citizens Allied to Protect the Environment); Cape-Atlantic Green Party; Cape-Atlantic Pax Christi; CATA (El Comite de Apoyo A los Trabajadores Agricolas); Center for Energy and Environmental Policy, John Byrne (for i.d. only); Center for Environmental Responsibility; Central Pennsylvania Citizens for Survival; CHORD; Citizens' Energy Council; Citizens Protecting Ohio; Clean Ocean Action; Coalition Against Toxics; Coalition for Peace and Justice; Coalition Against Plutonium Economics; Committee for Nuclear Power Postponement; Concerned Citizens of Cape May County; Consumers League of New Jersey; Craft's Creek Coalition; Cumberland Conservation League; Cumberland-Salem Green Party; Delaware Riverkeeper Network (fish campaign only); Delaware Valley Peace Action; EAGLE (Estuary Group for a Lasting Environment); Energy Photovoltaics (EPV); Environmental Coalition on Nuclear Power; Environmental Response Network; First Hopewell Baptist Church; Fish Unlimited; Friends of Pinebrook; GEO (Glassboro Environmental Organization; Gloucester County Green Party; Grassroots Environmental Organization (GREO); Green Action Alliance; Green Delaware; Ironbound Committee Against Toxic Waste; Jersey Coast Anti-Nuclear Alliance; Jersey Shore Nuclear Watch; Latino Community Land Trust; Mercer County Greens; Mobilization For Animals; Monmouth Citizens for Clean Air; Natural Law Party; New Jersey Environmental Federation; New Jersey Green Party; New Jersey Hiroshima Remembrance Day Committee; Newark Local, Green Party of Delaware; NIRS (Nuclear Information Resource Service); NJ ACORN; NJPIRG Citizen Lobby; NJ Recreational Fishing Alliance (fish campaign only); NJ Sierra Club; NJ/NY Environmental Watch; North Jersey Grey Panthers; Nuclear Free New York; Ocean County Green Party; Ocean Greens; Pacem in Terris, Sally Milbury-Steen (for i.d. only); Paterson Branch NAACP; Paterson Task Force for Community Action; PEN (Pennsylvania Environmental Network); Pennsylvania Consumer Action Network; Philadelphia Earth First; Philadelphia Green Party; Philadelphia Solar Energy Association; Physicians for Social Responsibility; Public Citizen; Republicans for Environmental Protection; Safe Legacy; Salem Quaker Quarterly Meeting; SAVE (Stockton Action Volunteers for the Environment) Save the Mountains; SEAC-Region 13 (Student Environmental Action Committee); Seaville Friends Meeting; South Jersey Campaign for Peace and Justice; Stockton Peace Action; Students for the Environment, University of Delaware; Swanton Civic Association; Three Mile Island Alert; Upper Rockaway Watershed Association; Urban Women's Center; Wilmington Local, Green Party of Delaware; Zero Waste America.