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NORTH AMERICAN WATER OFFICE

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November 6, 2001

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration Mail Stop T-6D 59
U.S. NRC
Washington D.C. 20555-0001 Peach_Bottom_EIS@nrc.gov

United States Nuclear Regulatory Commission
Office of Public Affairs, Region I
475 Allendale Road
King of Prussia, PA 19406

Attn: Diane Scence: dps@nrc.gov

RE: RE-Licensing Peach Bottom Unit 2 and Unit 3

Dear Chief, Rules and Directives Branch, U.S. NRC;
Diane Scenci:

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Rules and Directives Branch

By way of introduction, the North American Water Office (NAWO) is a 501 (c) 3 organization chartered in 1982 to educate people about solutions to problems caused by society's wastes. NAWO programs have a particular focus on reducing electric utility wastes and cleaning up the mess they leave behind. Our objective is to accomplish an energy transition, away from the costs, liabilities and risks of obsolete central-station technologies of the last century, and to modern efficiency technologies and the distributed generation technologies that offer so much more in terms of environmental protection, economic development and social justice.

NAWO is project sponsor of the Prairie Island Coalition, which formed in 1990 to intervene in decision-making regarding dry cask storage of irradiated fuel at the Prairie Island Nuclear Power Plant, owned and operated at the time by Northern States Power

www.nawo.org email: gwillc@mtn.org



Board of Directors: Laurence LaFond Chair, Shirley Little Bird Vice Chair, Lea Foushee Secretary/Treasurer, Jan Attridge, Bruce Drew, Ralph Hilgendorf, Rosalie Wahl, George Crocker, Executive Director.

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Add = D. Wheeler (dxw)

Company (NSP). While NSP sought permission for 48 TN-40 storage casks, due to Prairie Island Coalition intervention, ultimately, the 1994 Minnesota Legislature only authorized 17, and conditioned that authorization with numerous renewable energy mandates. As project sponsor of the Prairie Island Coalition, NAWO also organized the public interest intervention into the NSP v. Westinghouse lawsuit in Federal District Court. During the discovery process of this litigation, we reviewed over 1,000,000 pages of previously secret internal nuclear industry documents regarding steam generator tube degradation, and secured copies of over 60,000 of the more incriminating pages. In the course of our involvement with issues surrounding nuclear operations at Prairie Island, NAWO personnel have become familiar with and knowledgeable about the nuclear industry and various functions and purposes of the Nuclear Regulatory Commission.

The present attempt by Excelon to re-license the Peach Bottom reactors, and NRC processing Excelon's application, may serve interests intent upon preserving privilege and profit from nuclear operations. But on multiple grounds, there is no rational justification for re-licensing Peach Bottom now.

The Peach Bottom Unit 2 license does not expire until August 8, 2013. The Unit 3 license does not expire until July 2, 2014. To engage in re-licensing procedures twelve and thirteen years prior to license expiration betrays an agenda designed to serve corporate shareholder and nuclear industry interests, at the expense of public safety and fair, competitive electricity markets. If now were the appropriate time to consider re-licensing these reactors, the operating licenses would have been issued for an original 30 years, not 40.

This is particularly true considering the types and amount of premature reactor component degradation plaguing commercial reactors, and the lack of firm knowledge within the industry and its regulators regarding degradation causes, rates, and effective mitigation strategies.

The NRC, licensees and petitioners have opened numerous rule-making dockets attempting to deal with the collective ignorance regarding reactor component degradation, dockets which remain open to this day. This includes an open docket on steam-generator tube repair criteria, for example. Obviously, the ability to resolve tube repair criteria issues, or the more likely failure to be able to do so, has tremendous implications regarding the prudence of reactor re-licensing from a public health and safety perspective, and well as from a financial one.

More generally, without appropriate and thorough rules governing reactor re-licensing, there is no rational basis for the re-licensing process. It's all just arbitrary action in pursuit of privileged and private agendas. But while dockets regarding rules for current licenses on matters as basic as steam generator tube repair criteria remain open, there is no rational foundation for rules governing reactor re-licensing. Re-licensing should not be allowed to proceed in the face of this ignorance and the resulting speculation about public health and safety consequences of re-licensed nuclear operations.

As you know, the Peach Bottom reactors are not secure, and neither is any other commercial reactor in the country, or the world, for that matter. At this point in time, officials throughout the world are recognizing the multiple vulnerabilities of nuclear reactors, and are sounding warnings about the need to dramatically increase security precautions even as some of us recognize that the security threat from licensed facilities would remain, even in a locked-down police state. But in this setting, it does not seem prudent for the NRC to move forward with a re-licensing application for reactors that are protected primarily by a bodyguard of increasingly obvious lies.

There is no rational basis for re-licensing the Peach Bottom reactors, and without such a basis, the re-licensing process should be terminated. Unfortunately, we realize that preserving the nuclear option until catastrophe strikes is more important to the nuclear industry and its regulators than is proceeding rationally. So you will proceed with this misguided attempt to preserve private privilege and profit at public expense. But know that you are being watched, and be advised that irresponsible behavior usually produces consequences.

Sincerely,

A handwritten signature in cursive script that reads "George Crocker". The signature is fluid and extends across the width of the page.

George Crocker
Executive Director

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