

March 27, 2002

Mr. David H. Jaffe, Petition Manager  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT: SUPPORTING INFORMATION FOR PETITION PURSUANT TO 10 CFR 2.206  
REGARDING SAFETY AT OPERATING NUCLEAR POWER PLANTS**

Dear Mr. Jaffe:

Measure No. 1 of the 2.206 petition submitted March 11, 2002, and amended on March 21<sup>st</sup> and March 22<sup>nd</sup> sought to enhance safety at nuclear power plants by returning the limiting condition of operation (LCO) duration for emergency diesel generators to 72 hours.

I have been informed that the Braidwood nuclear power plant is one of the facilities that sought and obtained a license amendment giving a 14-day LCO for the emergency diesel generators. I have been told by a highly reliable source that subsequent to receiving this amendment, the plant safety assessment for Braidwood was updated. The updated risk numbers were not good and plant management imposed an administrative limit of 72 hours on emergency diesel generator outages.

First, this information supports the position articulated in our petition that longer LCO times for emergency diesel generators increase risk and that returning the LCO duration to 72 hours reduces risk.

Second, this information suggests that the Braidwood licensee may have violated federal safety regulations. When I worked at the Browns Ferry nuclear plant, several of our Senior Reactor Operators (SRO) got into the NRC's regulatory doghouse because they substituted administrative controls for compliance with Technical Specifications. For example, in 1981 an SRO got in trouble because he stationed an equipment operator at the doorway to the main steam tunnel because the steam leak detection instrumentation was inoperable. Twenty years ago it was unacceptable for licensees to substitute administrative controls for regulatory compliance. Is it now acceptable for the Braidwood licensee to find that its safety analysis supporting a license amendment is invalid and fix it with an administrative limit?

Sincerely on behalf of the petitioners,



David A. Lochbaum  
Nuclear Safety Engineer  
Union of Concerned Scientists



Union of Concerned Scientists

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