

EDO Principal Correspondence Control

FROM: DUE: 11/14/02

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FINAL REPLY:

Norman Cohen
UNPLUG Salem Campaign

TO:

Chairman Meserve

FOR SIGNATURE OF :

** GRN **

CRC NO: 02-0646

Collins, NRR

DESC:

2.206 - Salem

ROUTING:

Travers
Paperiello
Kane
Norry
Craig
Burns
Miller, RI
Cyr, OGC
Skay, NRR
Goldberg, OGC

DATE: 10/10/02

ASSIGNED TO:

NRR

CONTACT:

Collins

SPECIAL INSTRUCTIONS OR REMARKS:

12150



CLOSE THE SALEM NUKES NOW
The UNPLUG SALEM Campaign
321 Barr Ave., Linwood NJ 08221
609-601-8583/601-8537; ncohen12@comcast.net
<http://www.unplugsalem.org/>

Date: 10/8/02

To: Richard Meserve, Chair, Nuclear Regulatory Commission,

Dear Mr. Meserve,

Please consider this letter as a prospective 2.206 petition.

The Close the Salem Nukes Now – UNPLUG Salem Campaign has learned that PSEG plans to replace the defective steam generators in Salem Unit 2 during the year 2006 refueling outage. The New Jersey Bureau of Nuclear Engineering conveyed this information to us.

We applaud PSEG's decision to finally replace Unit 2's defective steam generators. This decision confirms that the UNPLUG Salem Campaign was correct during the last two years as we have urged NRC and PSEG to indeed take this vital step to ensure the safety of the citizens of South Jersey, Delaware and Eastern Pennsylvania. This decision confirms that NRC and PSEG were wrong in saying that the steam generators at Unit 2 were safe. They were not, and are not, safe.

While we applaud the decision to finally replace Unit 2's defective steam generators, we have some major concerns about this decision. NRC inaction led to the accidents at Indian Point (steam tube rupture) and Davis Besse (almost a LOCA). NRC allowed both nuclear plants to operate too long in an unsafe condition. We are concerned that allowing PSEG to put profits before safety by waiting until 2006 to replace Unit 2's steam generator is an unnecessary safety risk, especially coupled with the risk of a multiple steam tube rupture which NRC's own ACRS committee agrees is possible.

Therefore, our first request is that NRC require PSEG to replace the steam generator in Unit 2 NOW, and not wait until 2006. If that request is rejected, we would consider agreeing to having PSEG replace the steam generator during the 2004 refueling outage while PSEG

is replacing their turbines, if NRC can guarantee, in writing, that the steam generator tubes in Unit 2 will not rupture between now and 2004.

If NRC provides the UNPLUG Salem Campaign with this written guarantee, we hope that it will explain how that guarantee is possible given that the NRC still has not completed its Steam Generator Action Plan originally issued in November 2000 after the Indian Point accident. According to the latest quarterly update publicly available (March 29, 2002), many essential tasks have not been completed.

For example, Item 3.4(l) is to "Develop data and analyses for predicting leak rates for degraded tubes in restricted areas under design basis and severe accident conditions," a task not scheduled to be completed until the end of 2003. Another example is Item 3.10(b) "Using the extensive experience on stress corrosion cracking in operating SGs [steam generators], and results from laboratory testing under prototypic conditions, develop models for predicting the cracking behavior of SG tubing in the operating environment," a task not scheduled to be completed until December 31, 2006. The Steam Generator Action Plan lists a large number of things that the NRC does not know and will not know for years. We wonder how the NRC can possibly know today that it is safe to operate the Salem reactor with degraded tubes in its steam generators until 2006.

We find it troubling that PSEG scheduled the turbine replacement first, in 2004, instead of the steam generator replacement. Of course, turbine replacement means additional power production and thus additional revenue to PSEG.

Our second concern is with what type of alloy is used in the replacement steam generator. Experts, including a former PSEG steam generator specialist, recommend alloy 690, instead of alloy 600, for any new steam generator. We request that NRC require the use of alloy 690.

After the debacles of Indian Point and Davis Bessie, NRC should be completely committed, in both words and practice, to totally support public safety over corporate profits. By agreeing to these two requests of the UNPLUG Salem Campaign, NRC would go a long way to reestablishing its claim that it supports safety first.

Sincerely,



Norman T. Cohen
Coordinator

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