

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mailstop T-6D 59
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001

7/3/03
68FR 39984
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Rules and Directives

Subject: License Renewal of the R.E. Ginna Nuclear Power Plant

Dear Chief,

I ask for your investigation and close scrutiny into five concerns pertaining to the appropriateness of renewing R.E. Ginna's license for an additional 20 years.

First, regarding the problem of reactor vessel and reactor piping embrittlement, we know that as a reactor ages, safety margins are diminished. How extensive is embrittlement at Ginna and what steps have been and are being taken to address this problem and insure the safety of the public in case of system failure? What costs will be incurred? Do we have any experience regarding the embrittlement problem based on a reactor operating beyond its forty year life expectancy?

Second, we know that the NRC has known about seal weld cracking and leaking around the reactor vessel head control rods since the Beznau-1 incident in Switzerland in 1971 and that the NRC has ignored the problem of holes in the reactor vessel head due to boric acid corrosion for 30 years until Ohio's Davis-Besse reactor vessel develop a hole through its 214mm thick head, extending to the 4.8mm stainless steel clad. We know that 100's of cracks in weld seals go undetected because the best available inspection technology is not used. What is that current condition of the Ginna reactor vessel head? Since this is a problem germane to all Pressurized Water Reactors (PWR's) and Ginna has operated for thirty-four years, will it become necessary to replace the reactor vessel head, and, if so, at what cost to the customer?

Third, although the NRC has excluded the issue of terrorist attacks from licensing hearing because it is "unquantifiable", it remains a viable concern to all nuclear facilities and the general public. We all know that nuclear facilities represent targets of opportunity for terrorists to inflict mass civilian casualties and widespread long-term economic damage. At Ginna, the spent fuel pool has less protection and is at greater risk than the reactor vessel itself. What measures are being taken to insure that mortar attack from farmland or Lake Ontario or air attack by plane will be prevented? What is the cost to the consumer?

Fourth, what is the current status of the decommissioning fund? Is it fully protected from drawdowns for other purposes and is the amount sufficient for environmental sound closure?

And finally, if extending Ginna's operating license is based on public safety and sound economics, why is RG&E planning to sell the plant?

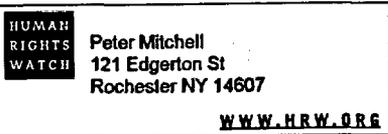
As servants of the public interest and concerned citizens who want the highest and best for your country and for humankind, it is my hope that you will use both a sound mind and an open heart in reaching your decision.

Thank you,



8/15/2003

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F-EPDS = ADM-03
Call = R. Schaeff (RIS)

Temporarily = ADM-013