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To: <Chairman@nrc.gov>
Date: Wed, Apr 21, 2004 11:18 AM
Subject: PRM-50-78 and Kewaunee

DOCKET NUMBER

PETITION RULE PRM 50-78
(67FR66347)

DOCKETED
USNRC

April 27, 2004 (9:30AM)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

NRC action on PRM-50-78 is long overdue. At Kewaunee, fouling of heat exchangers for the safety injection pump oil coolers led to a shutdown on January 16, 2004. I find it laughable that NRC sent a special inspection team to look into this and NRC then had the audacity to report that it Determined that there was a safety problem.

And then, the NRC team was to issue a report of its findings. What has happened to the LER system? And are your resident inspectors so incompetent that they cannot verify the accuracy of an LER?

I note that Marion of NEI documented his organization's intense opposition to possible NRC actions that would anticipate the impact of fouling of heat transfer surfaces on nuclear plant safety.

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Template = SECY-067

SECY-02