

EDO Principal Correspondence Control

FROM: DUE: 07/28/04 EDO CONTROL: G20040422  
DOC DT: 06/18/04  
FINAL REPLY:

Mary Lampert  
Massachusetts Citizens for Safe Energy

TO:

Chairman Diaz

FOR SIGNATURE OF : \*\* GRN \*\* CRC NO: 04-0387

Dyer, NRR

DESC:

ROUTING:

2.206 - Pilgrim Nuclear Power Station

Reyes  
Norry  
Virgilio  
Kane  
Collins  
Dean  
Burns/Cyr  
Miller, RI  
Cyr, OGC  
Skay, NRR  
Goldberg, OGC

DATE: 06/23/04

ASSIGNED TO: CONTACT:  
NRR Dyer

SPECIAL INSTRUCTIONS OR REMARKS:

*Template: SECY-017*

*E-RIDS: SECY-01*

OFFICE OF THE SECRETARY  
CORRESPONDENCE CONTROL TICKET

*Date Printed: Jun 21, 2004 16:07*

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**PAPER NUMBER:** LTR-04-0387 **LOGGING DATE:** 06/21/2004  
**ACTION OFFICE:** EDO

**AUTHOR:** Mary Lampert  
**AFFILIATION:** MA  
**ADDRESSEE:** Nils Diaz  
**SUBJECT:** Pilgrim nuclear power station

**ACTION:** Appropriate  
**DISTRIBUTION:** Chairman, Comrs

**LETTER DATE:** 06/18/2004

**ACKNOWLEDGED:** No  
**SPECIAL HANDLING:** Handle as 2.206 petition

**NOTES:** OCM #5299

**FILE LOCATION:** ADAMS

**DATE DUE:** **DATE SIGNED:**

EDO --G20040422

5299

**PETITION TO U.S. NUCLEAR REGULATORY COMMISSION**

**Submitted by Mary Elizabeth Lampert; on June 12, 2004;  
regarding issues enclosed herein concerning Pilgrim NPS,  
Plymouth, Massachusetts.**

CHAIRMAN R.F.C.D.  
04 JUN 18 PM 3:22

Mary Elizabeth Lampert  
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By email, original text by mail.

5299

June 12, 2004

Commissioner Nils Diaz  
U.S. Nuclear regulatory Commission  
Washington, D.C. 20555

Dear Mr. Chairman:

As you know Duxbury, Massachusetts is within the Pilgrim Nuclear Power Station's Emergency Planning Zone. My residence is approximately 6 miles across open water from the reactor. Therefore, safety at Pilgrim NPS is a primary concern to me due to its potential direct impact upon my family's health, property and community.

I request that this correspondence be regarded, and treated as, a 2.206 petition.

#### Summary

**Reactor:** Pilgrim Nuclear Power Station, Plymouth, Massachusetts

**Request for Enforcement Action:** Require Pilgrim NPS to cease operations during a strike of its workers – U.W.U.A. local 369 – if a strike occurs.

**Facts that constitute the basis for taking this action:** discussed herein.

#### Discussion

I am filing a 2.206 petition as the only means available to me to address safety concerns over the present contract negotiations between Entergy Nuclear Northeast and U.W.U.A. local 369.

U.W.U.A. local 369 provides workers for the Pilgrim Nuclear Power Station in Plymouth, Massachusetts. The union has been in contract negotiations for local 369 technical for over 2 years and has not yet come close to signing a contract with Entergy Nuclear Generating Company, the owners and operators of Pilgrim NPS. The union is now negotiating the P&M contract for local 369, and every offer proposed by Entergy Nuclear Generating Company has been far less than what was agreed upon in the past. Union representatives do not believe the licensee is negotiating in good faith at this time and they have signed contracts with vendor companies to provide personnel as replacement workers should a strike occur.

The lack of progress in negotiations is troubling for workers; however, I am concerned that the licensees intentions to operate the plant with replacement workers should a strike occur would jeopardize safety.

Pilgrim employs about 550 workers; about 350 are in the UWA Local 369 whose contract expires June 13, according to the Patriot Ledger, June 12, 2004. Local 369 is made up of, but not limited to: Radiation Protection Technicians, Nuclear Chemistry Technicians and Plant Operations Personnel. They have been trained on the site-specifics of Pilgrim NPS. Therefore bringing in workers from Entergy's other plants or hiring other workers to keep operations going without a significant shutdown for training at Pilgrim NPS is unacceptable.

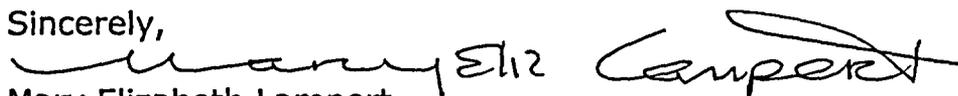
Some features are unique to Pilgrim NPS - U.S. reactors are not stamped out by cookie-cutters - each has its own history and track record. For example: some components do not operate as designed and require special training to compensate for mechanical glitches; and some components were identified by the Government Accounting Office as counterfeit/substandard. Also the union workers were trained to respond to emergencies up to and including area evacuation and terrorism - vulnerabilities, terrain, implementing procedures etc vary from site to site.

I do not believe the plant can be operated safely by replacement workers that have not received site specific training; do not have years of experience at the site; do not have a history specific to Pilgrim NPS. This cannot be taught in a few hours, days or even weeks. I will also add that if a strike occurs it is likely to coincide with the Democratic National Convention in Boston. A terrorist warning has been announced for that period, here. Hence, it is no time to take chances; indeed, with nuclear power, there is never any time for chances.

Therefore, to preserve public safety and public confidence in NRCs ability and willingness to regulate licensees to safeguard public interest, I request in this petition that Pilgrim Nuclear Power Station not be allowed to continue to operate during a strike.

I look forward to your response; due to confidentiality, I cannot provide copies of communications from workers for documentation.

Sincerely,



Mary Elizabeth Lampert

148 Washington Street - Duxbury, MA 02332

Tel 781-934-0389 Email Lampert@adelphia.net

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148 Washington Street  
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Commissioner Nils Diaz  
United States Nuclear Regulatory Commission  
Washington DC 20555