

Action: Miller, Region I  
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**Union of Concerned Scientists**  
Citizens and Scientists for Environmental Solutions

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June 21, 2004

Mr. A. Randolph Blough, Director – Division of Reactor Projects  
United States Nuclear Regulatory Commission Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

**SUBJECT: SAME PROBLEMS AT SAME NUCLEAR PLANT DESERVE SAME PROTECTION FOR THE PUBLIC**

Dear Mr. Blough:

By letter dated April 1, 1998, Mr. James C. Linville of the NRC's Region I staff transmitted Revision 6 of the NRC Restart Action Plan (RAP) for Salem to Mr. Leon R. Eliason, then the Chief Nuclear Officer and President of the Nuclear Business Unit for the Public Service Electric and Gas Company. Mr. Linville stated:

*The RAP was originally published on February 23, 1996 to describe NRC's planned monitoring activities for restart of the Salem Units.*

Mr. Linville went on to explain that Revision of the RAP documented, among other things:

*A review to ensure that all restart items have been closed to support restart of Salem Unit 1.*

The NRC's Restart Action Plan listed a number of activities that PSEG had to complete and NRC had to review and accept before the Salem reactors could safely restart. Had the NRC's review of any single item deemed its completion to be unacceptable, restart approval would not have been granted.

**THE VERY SAME SAFETY PROBLEMS THAT NRC REQUIRED TO BE CORRECTED IN 1998 BEFORE SALEM UNIT 1 COULD RESTART NOW AFFLICT BOTH SALEM REACTORS AND HOPE CREEK, YET NRC ALLOWS ALL THREE REACTORS TO CONTINUE OPERATING.**

I count eight (8) of the items on the NRC's Restart Action Plan that clearly exist today:

1. Programmatic Restart Issues Item 10: Corrective action program, including adequacy of root cause program.

The NRC along with Synergy, Utility Services Alliance, and the Independent Assessment Team concur that the corrective action program at Salem and Hope Creek is inadequate.

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2. Programmatic Restart Issues Item 17: Adequacy of work control and planning.

The NRC along with Synergy, Utility Services Alliance, and the Independent Assessment Team concur that work control and planning at Salem and Hope Creek is inadequate.

3. June 9, 1995, Confirmatory Action Letter Item 2: PSE&G to perform a special review of longstanding equipment reliability and operability issues, including corrective maintenance and operator workarounds; the effectiveness and quality of management oversight and review of these matters; and communicate the findings to the NRC.

PSEG senior manager Mike Brothers stated during the June 16, 2004, public meeting that he considered longstanding material condition issues to be the largest challenge at Salem and Hope Creek. Perhaps he and the NRC should review the PSEG letter dated February 13, 1996, to the NRC that stated how this problem had been "fixed."

4. Programmatic Restart Issues Item 3: Adequacy and use of procedures, including procedure revision backlog.

Mr. Jim O'Hanlon, leader of the Independent Assessment Team, stated during the June 16, 2004, public meeting that procedure compliance at Salem and Hope Creek was a problem. PSEG senior manager Mike Brothers stated during this same meeting that he felt that failure to establish and enforce proper standards led to the procedure adherence problems, just as it caused the poor material conditions.

5. Programmatic Restart Issues Item 11: Engineering contribution to problem resolution, including safety evaluations.

Mr. Jim O'Hanlon, leader of the Independent Assessment Team, stated during the June 16, 2004, public meeting that the team's review of 14 recent operational events at Salem and Hope Creek determined that Engineering was not as effective as expected.

6. Programmatic Restart Issues Item 18: Parts availability & accuracy of bill of materials.

The Synergy and Utility Services Alliance evaluations identified that corrective actions were delayed due to unavailability of spare parts. PSEG senior manager Chris Bakken stated during the June 16, 2004, public meeting that PSEG maintained two to three times the dollar inventory of spare parts at Salem/Hope Creek as at the typical nuclear plant site, but they did not maintain the right parts onsite. Mr. Bakken also reported that the parts unavailability problems were related to the work control problems in that effective implementation of the 13-week planning cycle would provide sufficient time to acquire proper parts.

7. Programmatic Restart Issues Item 21: Licensee self-assessment capability (Performance monitoring & trending).

The Utility Services Alliance evaluated PSEG's performance as "Less Than Competent" in 73 of 90 areas. This suggests that PSEG had ineffective self-assessment capability. [The alternative being that PSEG had effective self-assessment capability, but simply didn't care that they were performing less than competently.] The myriad of new performance indicators and metrics described by PSEG senior manager Mike Brothers during the June 16, 2004, public meeting reinforces the conclusion that self-assessment capability is inadequate.

8. Programmatic Restart Issues Item 12: Tagging.

The Synergy evaluation and a series of OSHA reportables indicate that tagging problems plague Salem and Hope Creek.

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There are a few other items from that 1998 Restart Action Plan, such as the emergency diesel generator and service water system technical issues, that might be present at Salem today, but I will give PSEG benefit of the doubt on the close ones.

Any one of the above eight items being uncorrected would have prevented NRC from allowing Salem to restart back in 1998. For some unfathomable reason, all EIGHT items uncorrected today do not prompt NRC to require Salem to shut down today.

If proper protection of public health and safety could not be reasonably assured in 1998 unless all eight problems were corrected before reactor operation, then the fact that the Salem and Hope Creek reactors are operating today with these very same problems means that the public is exposed to undue hazard.

Please take the same steps to protect the public now as you took in 1996-1998 to protect them. Shut down the three reactors and keep them shut down until PSEG once again convinces NRC that there are fixed.

Sincerely,

*<ORIGINAL SIGNED BY>*

David Lochbaum  
Nuclear Safety Engineer  
Washington Office