

EDO Principal Correspondence Control

FROM: DUE: 08/04/04 EDO CONTROL: G20040435
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FINAL REPLY:

Mary Lampert
Massachusetts Citizens for Safe Energy

TO:

Chairman Diaz

FOR SIGNATURE OF : ** GRN ** CRC NO: 04-0403

Dyer, NRR

DESC:

ROUTING:

2.206 - Pilgrim Nuclear Power Station

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

DATE: 06/30/04

ASSIGNED TO: CONTACT:

NRR

Dyer

SPECIAL INSTRUCTIONS OR REMARKS:

Template: SEC4-017

E-RIDS: SEC4-017

PETITION TO >U.S. NUCLEAR REGULATORY COMMISSION>

**Submitted by Mary Elizabeth Lampert on behalf of the undersigned;
on June 18, 2004; regarding issues enclosed herein concerning
Pilgrim NPS, Plymouth, Massachusetts.**

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By email, original text by mail.

June 18, 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. Ms. Lampert's residence is approximately 6 miles across open water from the reactor. Therefore, safety at Pilgrim NPS is a primary concern due to its potential direct impact upon my family's health, property and community.

Due to the known consequences of a disaster at Pilgrim NPS, having the potential of contaminating a wide geographic area, the undersigned all have a direct interest in this petition.

We 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 over a sufficient time period bracketing the Democratic National Convention in Boston and the July 4th National Holiday.

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

Discussion

We are filing a 2.206 petition as the only means available to us to address safety concerns presented over the heightened threat of terrorism during the Democratic National Convention and over the July 4th national holiday.

Threat Established

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Nuclear reactors are known terrorist targets.

The federal government has warned of increased threat of a terrorist attack during the Democratic National Convention. One can not assume that the threat pertains only to downtown Boston an attack anywhere in the area would have the desired impact. In fact there are few other targets with greater potential impact.

As you are aware, the Sandia National lab in their consequence analysis of a core melt at Pilgrim NPS stated that the 1st year peak fatal radius would be 20 miles and the 1st year peak injury radius would be 65 miles. A spent fuel pool disaster would result in far worse consequences due to the huge amount of radioactivity now stored in its densely-packed pool; and the pool is outside primary containment.

The federal government has also warned that important national holidays present increased risk of terrorism. July 4th indeed would be symbolic, especially a strike in America's Hometown.

Risk Reduced If Reactor Shut Down

For example, Dr. Edwin Lyman, physicist Union Concerned Scientists, stated that the risk of a core meltdown is considerably reduced within hours of the reactor being closed. He reasoned that it is easier to protect and monitor a reactor that is closed because it is less likely that safety systems could be compromised. A core melt can be triggered by cutting off-site power, destroying coolant intakes, sabotaging/destroying safety systems, destroying the control room, etc.

According to a preliminary analysis by Dr. Lyman of Indian Point after a shutdown of 20 days would greatly reduce the radioactive inventory in the core through half-life decay. Lessons learned can be readily transferred to Pilgrim NPS. The number of fatalities from a core melt and breach of containment could be reduced by 80% and the number of long-term cancer deaths by 50%.

Simply throttling-back the reactor, powering down, would not suffice.

David Lockbaum, Union of Concerned Scientists, was asked to comment on this option. He stated that the throttle back vs. shutdown argument came up prior to Y2K. Several nuclear plants did indeed throttle back on December 31st as a precaution. Precautionary measures were justified then; and now, certainly is the time to take more stringent additional measures.

Throttling back increases the margin to respond to minor transients. For example, if a pump trips, the chances of the reactor staying online are higher if it happens at 80% power instead of at 100% power.

If the threat is terrorism, throttling back lowers the risk from that of the reactor at full power, but it is still significantly higher than the risk of a reactor that has been shut down awhile.

Therefore, to preserve public safety and public confidence in NRC's ability and willingness to regulate in the public's interest, I request in this petition that Pilgrim Nuclear Power Station not be allowed to continue to operate over a sufficient time period bracketing the Democratic National Convention in Boston and the July 4th National Holiday. Warnings of increased terrorist threat have been announced for those periods. Hence, it is no time to take chances; indeed, with nuclear power, there is never any time for chances.

We look forward to prompt precautionary actions to protect public safety.

Sincerely,

Mary Elizabeth Lampert

Pilgrim Watch & Duxbury Nuclear Advisory Committee, Chair

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