

From: <NancyBurtonEsq@aol.com>
To: <rle@nrc.gov>
Date: Wed, Mar 30, 2005 12:07 PM
Subject: Millstone's Degrading Conditions

CONNECTICUT COALITION AGAINST MILLSTONE
www.mothballmillstone.org (<http://www.mothballmillstone.org>)
March 30, 2005

Dear Mr. Emch:

Please include the letter which appears below and which we have submitted to The New London Day for publication, in the record of your proceedings involving the Millstone Environmental Impact Statement for Millstone relicensing.

Thank you for your assistance.

Sincerely,

Nancy Burton

Tel. 203-938-3952

CONNECTICUT COALITION AGAINST MILLSTONE
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March 30, 2005

To The Editors:

We must give The New London Day a "thumbs-down" for keeping the community in the dark about degrading conditions at the Millstone Nuclear Power Station which endanger the public.

Did we attend the same meeting as your reporter who wrote the article entitled "NRC Gives Millstone a Thumbs Up for Safety" (March 30, 2005)? At a meeting on March 29, the Connecticut Coalition Against Millstone shared the scathing reviews the U.S. Nuclear Regulatory Commission has given of Millstone's performance during the year 2004.

Space limitations require us to cite only a few specific examples below.

Please go to our website, [_www.mothballmillstone.org_](http://www.mothballmillstone.org)

(<http://www.mothballmillstone.org>) for an expose of Dominion's safety breaches committed during the year 2004

* A spent nuclear fuel rod broke at Unit 2 on August 5 while operators were inspecting fuel assembly failures. The lethal rod fragmented and it took a week for Dominion to recover all the pieces.

* During a draindown of the vital reactor coolant system at Unit 3, the worker assigned to monitoring the refuel pool level left his assignment before completion and the critical draindown occurred in his absence for 1.5 hours. Operators were left to rely on the remote camera indication of the refuel pool level – and they read it incorrectly. The NRC correctly called this safety breach "more than minor" because it "affected the likelihood of causing a loss of reactor water inventory to the point that shutdown cooling could be lost."

* Millstone Unit 3 suffered repetitive failures of leakage tests for vital water systems. Over a span of eight years – including three years of Dominion operations – the same known failure mechanism resulted in a 50 per cent failure rate for critical check valves.

* Unit 2's reactor trip breaker failed to shut remotely. This is alarming, given Unit 2's unusual propensity to suffer unexpected and dangerous spontaneous "trips" or shutdowns.

- * Unit 2 suffered four reactor "trips" during the inspection period due to equipment failures or personnel error.
- * Dominion allowed Millstone's "high-range" radiation monitor – key to measuring radiation doses to the public – to become seriously degraded.
- * On April 4, while Dominion was preparing to remove the reactor vessel head at Unit 3, an overhead crane malfunctioned, causing significant damage to a critical lifting rig and damaging personnel safety equipment.
- * On April 14, workers discovered that a fuel assembly "had moved several inches upon coming out of the core and would not travel into the mast without causing an overload condition."
- * Unit 2 used materials from an unqualified vendor.
- * At Unit 2, a reactor trip breaker failed to shut.
- * The Unit 2 spent fuel pool ventilation system was allowed to become degraded.
- * Inspectors discovered a critical modification was made to the Unit 2 spent fuel pool water level indicator without documentation.
- * At Unit 2, a loss of shutdown cooling occurred, resulting in an uncontrolled reactor coolant system temperature increase of 14 degrees Fahrenheit.
- * Dominion repeatedly violated Technical Specifications (its formal licensing conditions) throughout 2004. These "Tech Specs" are legal requirements the public has a right to expect will be carried out and enforced.
- * NRC inspectors discovered boric-acid buildup on the Unit 3 reactor vessel head worse than what was reported by Dominion.
- * Dominion violated its Technical Specifications when an electrical system failure required it to stop reactivity additions to the Unit 3 nuclear reactor; contrarily, operators increased reactivity and heat buildup.
- * The emergency diesel generator was allowed to develop a "through-wall" leak at Unit 2.
- * The emergency building filtration system at Unit 2 was allowed to degrade.
- * A thermal performance test of a vital system at Unit 3 was terminated prior to completion.
- * Inspectors discovered that modifications to Unit 2's charging system were not supported by calculations or test data.
- * Dominion's failure to properly employ engineering controls led to serious radiation exposures to two workers who handled contaminated air filters at Unit 2 on September 29.
- * Unit 2 suffered "excessive leakage" in the radioactive cooling system because of a pump failure.
- * The Unit 2 intake structures suffered degrading conditions on November 5, potentially jeopardizing the critical reactor cooling system, due to high winds and high seas.

In their inspection reports of 2004, NRC's inspectors concluded that Dominion has failed to address degraded conditions at Millstone. NRC inspectors gave these examples:

1. Operators did not recognize the significance of several steam generator code "safeties" that had lifted subsequent to reactor trips at Unit 2;
2. Operators did not recognize that a failure of a vital inverter made the electrical train credited, as required by the Technical Specifications, inoperable at Unit 3;
3. Operators did not understand the potential significance of air found in the discharge piping of the RHR (residual heat removal) system at Unit 3 and their evaluation was not technically supported;
4. Operators did not adequately consider the effects of small oil leaks on high head safety injection pumps at Unit 3;

5. Operators and engineers at Unit 2 determined compensatory cooling measures installed in a direct current switchgear room at Unit 2 would ensure the availability of the switchgear, while existing technical evaluation stated just the opposite.

NRC inspectors concluded that during the year 2004, they "found a lack of rigor by Dominion related to both the understanding of the effects of degraded conditions and the technical bases used to evaluate degraded conditions . . . resulting in violations [of Millstone's licensing requirements]."

The blistering NRC inspection reports demonstrate that Dominion is routinely operating Millstone in violation of its legal requirements and endangering the public on a daily basis.

Astonishingly, when the NRC inspectors presented their review of Millstone's 2004 performance history on March 29 at a public meeting, they stated that Dominion's good performance during 2004 warranted reduced NRC inspections.

The NRC's conduct is disturbing, especially in light of the following:

On December 31, 2004, the NRC completed a special inspection of Dominion's fire protection system. The NRC inspectors randomly chose six areas to inspect at Unit 2. One was the turbine building. The NRC reported: "No findings of significance were identified."

On January 14, 2005, just two weeks later, a fire broke out in the Unit 2 turbine building. That fire caused an unprecedented all-site evacuation by non-emergency personnel. That fire also disabled Millstone site security: as a result of the January 14 fire, Dominion lost control over its perimeter fence and lost its ability to exclude intruders and keep track of personnel movement within the nuclear plant.

Dominion operated Millstone in the year 2004 as though no one was watching.

When the NRC inspectors announced they will reduce their inspections at Millstone during the next year because of Dominion's "good performance" in 2004, the NRC was really telling Dominion it has carte blanche to disregard its licensing requirements

Does the NRC think no one is watching?

Sincerely,

Nancy Burton

Nancy Burton is a founder of the Connecticut Coalition Against Millstone.

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