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Chief, Rules and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission
Washington, DC 20555 0001

RE: Register notice: page 1774, Federal Register / Vol. 71, No.
7 / Wednesday, January 11, 2006.

To the Chief:

I am outraged and deeply concerned about risk assessments in the draft Safety Evaluation (SE) released by NRC regarding Vermont Yankee. These assessments are based on the fallacious assumption that the reactor is new. The plant is not new, so "design basis" safety margins do not apply. Reduced safety margins on every page of the SE add up to a significant reduction in safety margins overall.

The NRC actually has no idea what safety margins apply to this aged, brittle, cracked plant, because you have refused to do an independent safety assessment to inspect the degree to which components are leaking, degraded, cracked or inoperable. In the ACRS hearings, NRR staff admitted there were better methods to evaluate system integrity under uprate conditions, but NRC is not using them.

All of the above argue that the NRC is wrong and should revisit its decision after performing an Independent Safety Assessment, with a real risk and consequence assessment.

Regards,

Peter d'Errico

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