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850 Meadowbrook Road
Brattleboro, Vermont 05301
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RULES AND DIRECTIVES
BRANCH
USNRC

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

Dear Chief Lesar:

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

We are strongly opposed to a 20% power uprate at the Vermont Yankee Nuclear Power Plant (VY). The conclusion reached by the NRC that the uprate "would not involve a significant reduction in a margin of safety" is flawed because it assumes the plant is new and not an aging 33-year-old plant.

Arnold Gunderson, nuclear engineer and safety consultant, has stated that "age related equipment failures are already affecting the performance of VY." For example, "VY's steam dryer is already cracked, the Main Steam Isolation Valves are no longer able to meet their original leak criterion, and...any one of several small single failures within the containment system must inevitably also cause the failure of the emergency cooling systems."

It is essential that the NRC conduct an in-depth 20,000 hour Independent Safety Assessment like the one done at Maine Yankee by the NRC in 1996 before an uprate is approved.

Sincerely,

Janet W. Schwarz
Janet W. Schwarz

Walter F. Schwarz
Walter F. Schwarz

SISP Review Complete

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*ERIDS = ADM-03
Add = C. Raynor (CLR)
R. Emis (RKE)*