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

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Dear Sir/Madam:

I am writing to express my views about the proposed uprate for the Vermont Yankee Nuclear Power Station in Vernon, Vermont. Joining Senators and Congressmen from Vt. and surrounding states, in addition to the thousands of citizens they represent, I believe that an independent engineering assessment of this plant should be *required* before an uprate is granted because:

The risk assessments in the draft Safety Evaluation released by the NRC are based on the assumption that the reactor in question is new. This, of course, is a false assumption. This plant is over 30 years old. The extensive number of reduced safety margins on every page of the Safety Evaluation add up to a *significant reduction in safety margins overall*.

The NRC says: "significant uncertainty exists regarding the licensee's method for calculating stress on the steam dryer". The steam dryer in question currently displays many hairline cracks. Nevertheless, an experimental power ascension test is planned while the reactor is on-line to "test" plant systems. This planned effort amounts to an Experimental Power Uprate, similar to that which has been conducted at Quad Cities in Illinois with dangerous and disastrous results. The proposal to allow an experimental power ascension test at Vermont Yankee is irresponsible and risks the lives of all who live in the vicinity of this plant.

I vigorously disagree with the NRC staff's statement that the proposed uprate, "would not involve a significant reduction in a margin of safety."

Given the facts, I would expect the NRC to reassess its decision to grant this uprate *after performing a thorough, independent, engineering assessment and a real risk and consequence assessment of this plant.*

Sincerely,



Margaret P. Bartenhagen

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E-RIDS = ADM-03

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SISP Review Complete

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