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RULES AND DIRECTIVES
BRANCH
USNRC

2450 Packer Corners Road
Guilford, VT 05301

2006 FEB 22 AM 9:14

February 5, 2006

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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

RECEIVED

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

Dear Chief, NRC

I am writing as a U.S. Citizen who lives within the Evacuation Zone of the Entergy Nuclear/Vermont Yankee (ENVY) in Vernon, Vermont to express my extreme concerns about the proposed 20% energy uprate and to request an Independent Safety Assessment..

My concerns include the following:

- The risk assessments in the draft Safety Evaluation released by the NRC are based on the fallacious assumption that the reactor is brand new. The plant is NOT brand new, so the design basis safety margins NO LONGER APPLY. The vast number of reduced safety margins on every page of the SE add up to a SIGNIFICANT REDUCTION IN SAFETY MARGINS
- the defeat of containment overpressure by valves that might be in the wrong position (as recently revealed to be the case by the VT state nuclear engineer in testimony to the Advisory Committee on Reactor Safeguards) means that allowing credit for containment overpressure, even for 15 minutes, represents a significant reduction of a safety margin and of "defense in depth." An ISA is needed to ensure containment integrity.
- repeated events involving inoperability of the high pressure coolant injection system (HPCI system) call into question defense in depth. An ISA is needed to understand why this is happening and what else might go wrong in other back-up cooling systems.

The fatal flaw and limitation of probabilistic risk assessment is that it does not consider consequences and is based on theoretical design standards and not real experience. In the ACRS hearings NRR staff admitted there were better methods to evaluate system integrity under uprate conditions, but NRC is not using them. In order to protect the health, safety, and well being of my family and my community, I strongly urge you to conduct an Independent Safety Assessment. Not to do so exposes all of us to an unacceptable level of risk.

Sincerely
Linda and Robert Hecker

E-RIDS = ADM-03

add = @Rupor (CR)

R. Collins (RRE)

SESP Review Complete
Remedy letter = ADM-013