

Original Due Date: 09/01/2006

Ticket Number: 020060148

Document Date: 08/04/2006

NRR Received Date: 08/11/2006

From:

Theodore DelGaizo

TACs:

MD2801

To:

Chairman Klein

***** YELLOW *****

For Signature of:

Routing:

Dyer
Weber
Carpenter
Holahan
Boger
NRR Mailroom

Description:

Health and Safety of the Public

Assigned To:

DORL

Contact:

HANEY, CATHERINE

Special Instructions:

Contact individual @ BC level (call or write). Explain licensee's responsibility with respect to design basis and NPDES/state regulations

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

Public - Non Public
Sensitive - Non Sensitive

Date Printed: Aug 09, 2006 17:15

PAPER NUMBER: LTR-06-0389
ACTION OFFICE: EDO

AUTHOR: Theodore DelGaizo
AFFILIATION: PA
ADDRESSEE: CHRMs Dale Klein
SUBJECT: Health and safety of the public

ACTION: Appropriate
DISTRIBUTION: Chairman, Comrs

LETTER DATE: 08/04/2006
ACKNOWLEDGED: No
SPECIAL HANDLING:
NOTES:
FILE LOCATION: ADAMS
DATE DUE:

LOGGING DATE: 08/09/2006

To: Dyer, NRR
Appropriate Action

Oys: EDO
DEDMRS
DEDR
DEDIA
AO

Yellow ticket
to DORL

- contact individual
@ BC level (call or write,
- explain licensee's
responsibility wrt
design basis &
NPPES / state
requirements

due 9/1/06

DATE SIGNED:



Main Line Engineering

August 4, 2006

Dr. Dale E. Klein
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Health and Safety of the Public

Dear Dr. Klein:

If the charter of the NRC is to protect public health and safety, I fail to see how forcing the shutdown of nuclear power plants due to elevated river water temperatures serves that interest. My thesis is that more people (particularly the elderly) will be injured or perhaps die if they lose electric power during a prolonged heat-wave than would be injured by the design-basis loss-of-coolant accident (LOCA) that might occur during that same heat-wave. I am extremely confident in this thesis because heat-waves that threaten the stability of the electric-grid happen every summer. In the meantime, the probability of a LOCA coincident with a particular heat-wave is infinitesimally small (probably in the range of 1×10^{-9} per year).

Most nuclear plants have technical specifications that require plant shutdowns within several hours of exceeding some maximum river water temperature. These temperatures are typically above the highest temperature ever recorded in the river. At the same time, heat-waves that are compounded by drought conditions leave extremely small margins between recorded temperatures and these limits. Some day soon, the limits will be reached. The shutdown of a 1200 mega-watt (electric) generator (and possibly multiple units) because river temperature increases from 88.9°F to 89.1°F (with an 89°F limit based on computer analyses with substantial margins) is a policy that I personally wouldn't want to have to defend in the public square. Such shutdowns would likely impose severe consequences on the electric-grid.

I am a 40-year experienced nuclear professional-engineer with nuclear operating experience from the U.S. Navy submarine force. I have no stake in this letter other than to express a long-held concern that the policy that would shutdown an otherwise completely operational nuclear power plant in the midst of a life-threatening heat-wave should be reconsidered in light of the real impact on public health and safety. I would be pleased to discuss this issue with you or your staff should you so desire.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. J. DelGaizo', is written over a horizontal line.

Theodore J. DelGaizo, PE, Esq.
President and CEO