RAS 14452

From: "Sally Shaw" <acer8sac@comcast.net>
To: "NRC Hearing docket" <hearingdocket@nrc.gov>, <secy@nrc.gov>, <mxc7@nrc.gov>, <ksv@nrc.gov>
Date: Fri, Oct 12, 2007 12:01 PM
Subject: Additional comment to ASLB on ENVY Relicensing contentions

Additional Comment from Sally Shaw to ASLB on Vermont Yankee Relicensing. Judge Karlin: Please incorporate the following into your deliberations.

RE: NEC Contention 2: aging management of anticipated metal fatigue, pursuant to 10 CFR Section 54.21(a) and 10 CFR Section 54.21(c).

Entergy's aging managment program for the reactor vessel (beltline) is inadequate. The surveillance capsules originally incorporated into VY's reactor vessel expressly for the purpose of plant-specific monitoring of embrittlement are being ignored. From the Uprate SE,

p. 15 "The surveillance data from Susquehanna Unit 1 will be utilized to monitor the impact of neutron radiation on the VYNPS beltline materials" while VY's "untested capsules, originally part of the licensee's plant-specific surveillance program, having received significant amounts of neutron bombardment, will remain in place."

This is like using data from the Iraq Occupation to determine how we're doing in Afghanistan. Or using the Prairie Island cooling tower collapse to predict and prevent a similar event at VT Yankee. IT ONLY WORKS IF YOU STUDY AND THEN HEED THE DATA. Obviously, even if the Susquehanna capsule indicated dangerous embrittlement, Entergy would argue that it wasn't plant specific so they could ignore it. (The Prairie Island warning is a case in point. The lax safety culture at VT Yankee is further evidenced in the following hypocrisy: Despite engineer David McElwee claiming that "a hands on inspection where you could get your hands on actual members would be far better" Entergy is proposing to look at ANOTHER REACTOR'S SURVEILLANCE CAPSULES rather than their own, to determine the condition of the reactor vessel. They won't check their own capsules because that WOULD be plant specific data which they would be forced to heed. Another example: Entergy's record of using flawed projections, remote calculations and fuzzy math rather than actual installed instrument readings to determine fenceline radiation exposure, resulting in repeated violations of VT State Health standards.

We request the ASLB to require that Entergy pull out at least one capsule from the VY reactor vessel, determine the reactor's actual degree of embrittlement, and compare it to the neutron bombardment levels of a similarly located Susquehanna capsule to document their assumption that the capsules are interchangeable.

NRC should not allow data shared between reactors or probabilistic calculations to substitute for actual surveillance, testing, and monitoring of plant-specific conditions. This does not provide the public with "reasonable assurance" of anything.

Sally Shaw, Gill Massachusetts

October 12, 2007

"Our lives begin to end the day we become silent about things that really matter." ~MLK

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