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Secretary
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RULES AND DIRECTIVES
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USNRC

Dear Secretary:

I have just read an article by Bob Audette of the "Brattleboro Reformer" about the holding company that Entergy wants to set up for five of its plant sites: Vermont Yankee, Pilgrim, Indian Point, FitzPatrick, and Palisades.

I have a strong opinion OPPOSING the inclusion of Vermont Yankee, Indian Point Unit 1, Indian Point Unit 2, and Indian Point Unit 3 in this new organization. It is my opinion that these specific plants presently show the effects of being poorly managed and poorly maintained (and/or of having adequate corporate-supplied financial resources withheld.) Most importantly, I fear that they will be further away from the source of money necessary to run them safely.

Entergy/Vermont Yankee

In 2007 there was a collapse of one cell of a mechanical draft cooling tower due, in part, to interaction between carbon steel bolts and the treated timber members. The cure is to remove the carbon steel bolts, drill out the holes to a slightly larger diameter, then install the larger diameter stainless steel bolts. I believe that you can read all the publicly available material available without seeing any commitment by Entergy to replace the carbon steel bolts in the other, non-safety related cells.

Turbine stop valves and turbine control valves allow or stop the passage of steam to the main turbine (which then powers the main generator). During periodic testing, one of these valves closed but did not open. Although I would estimate, (from my own BWR plant operating experience, on an operating shift, with an SRO), that the radiation field in this area was probably 400 mR/hr to 600 mR/hr, Entergy did NOT shut down the plant to troubleshoot the problem in lower radiation levels. It appears that they sent in people with hammers. The hammers were applied to the linkage, it moved (too much) and so did the other stop valves. The result was an unanticipated plant shutdown.

Could I say here that I could fully accept a present lack of adequate funding to Vermont Yankee as sufficient reason for all these things to happen now under the present organization?

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Add = S. Little (SLL)
D. Pickett (dvp1)

Indian Point 1, Indian Point 2, and Indian Point 3 Contaminated Groundwater

Well, what can I say? If you don't live in the Hudson Valley, you have to find this story amusing. First there is contaminated water discovered leaking during excavation at Unit 2. Then the site groundwater is found contaminated. Next there is an announcement that analysis shows that the contamination water comes from the Unit 2 Spent Fuel Pool. After a search of the easy-to-get-to areas of the Unit 2 Spent Fuel Pool, ("accessible" is the term used), it is announced that the contamination really comes from Unit 1. And it has been going on for quite some time, it being characterized as "legacy" leakage. The solution is not to remove the Unit 1 spent fuel and drain the pool. The solution is to finally start running a Unit 1 Spent Fuel Pool demineralizer full time. Now what is continuing to leak out is less contaminated.

When spent fuel can finally be moved to outside cask storage, fuel from Unit 1 is not selected. A promise is made (this year, same as last year), that the Unit 1 Spent Fuel Pool will be empty by the end of the year.

Total amount of contaminated groundwater pumped and treated (or even simply diluted) to date: ZERO gallons.

Indian Point 2, Indian Point 3 Backup Power Sirens

Let's just start with one thought. Do you think that, if the people at Indian Point working for the two previous owners would have maintained the emergency sirens so they were actually reliable, Senator Clinton would have felt compelled to write a federal law to require backup power? (I don't.)

They didn't; she did.

A major problem here is the lack of NRC-provided motivation, (no effective Enforcement), to complete this project. In short, there has been no cost, (except the one \$130,000 fine), to not completing, (and then having to pay for), this job. And you can see it clearly in even simple things, like tree trimming around sirens. (Even this straightforward task was not attempted, as best I can recall, without first sharing the accountability for it with FEMA.)

But the fact remains that the Entergy corporation still has not completed a \$15 million project after many months of time (and a few deadlines) have passed.

Total number of IP nuclear plants presently allowed to run at 100%: two.

Total number of IP backup power emergency sirens operable: ZERO.

Here again, I could fully accept a present lack of adequate funding to Indian Point as sufficient reason for all these things to happen now under the present organization.

Therefore, because I feel that these four plants currently suffer from a shortage of resources, or at least lack permission to spend those resources, and because I feel that the situation will be worse under the proposed Entergy merchant plant organization, I am requesting that you do not allow these four plants to leave their present organization.

Yours truly,

Tom Gurdziel