

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

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Appropriate Action
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Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

June 20, 2008

Samuel J. Collins, Regional Administrator
United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Subject: NRC's Oyster Creek "Bend before Break" Criterion

Dear Mr. Collins:

Janet Tauro of the Grandmothers, Mothers, and More for Energy Safety (GRAMMES) copied me on her letter to you dated June 6, 2008. Ms. Tauro raised two points in her letter that caught my attention:

1. During the May 2008, annual assessment meeting, the NRC staff was reported to have assured the public that the NRC staff had determined that current drywell conditions met the 2.0 safety factor margin, but no documents existed to support that determination.

How did the NRC reach an undocumented determination? Was it via the straw poll process that worked so well in fall 2001 on Davis-Besse?

2. Mr. Richard Conte of your staff was reported to have informed Ms. Tauro that NRC inspectors "would stop refueling in October if they saw the drywell begin to buckle."

I'm familiar with the "leak before break" criterion for reactor coolant pressure boundary integrity and the studies supporting it. This "bend before break" criterion is new to me. Could you point me to studies, analyses, or even straw polls that provide the technical and/or regulatory basis for it?

Sincerely,

David Lochbaum
Director, Nuclear Safety Project