

2/05/2010
75 FR 6065

8

April 21, 2010

PAGE ONE OF THREE

Chief, Rules and Directives Branch
Division of Administrative Services
Mail Stop T-6D59, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re License Renewal for Kewaunee Power Station
By Dominion Energy Kewaunee Inc.
ADAMS Accession Number: ML082610294; ML082610303
Date docketed: 09/25/08

RECEIVED

2010 APR 22 AM 11:28

RULES AND DIRECTIVES
BRANCH
USNRC

To whom it may concern:

The license renewal application noticed above should be denied.

The Kewaunee Power Station has a poor record of operation and of accident response and management (see below) and must not be allowed to continue to risk the health and safety of power station workers, on-site management, the surrounding community, or the life of Lake Michigan.

As the Nuclear Regulatory Commission (NRC) knows, the Kewaunee operators have repeatedly shown ineptitude in their response to unusual events, power outages and leaks of tritiated water from the Kewaunee Power Station.

The "Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Kewaunee Power Station (NUREG-1437, Supplement 40) Draft Report for Comment," fails to adequately address the threat to groundwater and to drinking water posed by the radioactive form of hydrogen, known as tritium, known to be leaking from the Kewaunee Power Station.

In August of 2006, the NRC admitted that groundwater under the Kewaunee Power Station is contaminated with tritium. The NRC said the contamination was of "possible safety or public interest significance," according to NRC Preliminary Notification of Event or Unusual Occurrence, No. PNO-III-06-019, August 14, 2006.

On August 9, 2006, reactor staff detected measurable tritium in groundwater at several locations beneath the auxiliary and turbine buildings. The contaminated water had leaked into four shafts beneath the two buildings which are used to measure possible settling of the structures. The shafts are not interconnected and indicate the presence of a large amount of contaminated water. The source of the one (1) -gallon-every-five (5) -minutes leak is still unknown.

For this reason, the Environmental Impact statement must adequately and thoroughly address the possibility of increased leakage of radioactive tritium to the groundwater

SONSI Review Complete
Template = ADM-013

E-R+DS = ADM-03
ada = D. Doyle (did)

and its threat to drinking water. The threat to human health posed by tritium ingestion must be exhaustively considered by the Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Kewaunee Power Station. However, because it is likely that a generic EIS is unable to put to rest questions regarding tritium contamination of groundwater in the time period allowed for the renewal process, the license renewal must be denied.

The license renewal application must also address the question of additional costs to ratepayers to cover the expense of finding the source(s) of tritium leakage, inspecting underground pipes that carry the power station's and its waste pool's tritiated water, repair and/or replacement of damaged and/or leaking piping carrying tritium, and the water replacement costs for nearby communities forced to pay for non-contaminated sources of drinking water.

For the above reasons, and in view of the record of dangerous and even reckless operator error documented below, I urge the commission to deny the application for a license renewal by Dominion Energy Kewaunee Inc. above.

Sincerely,

John LaForge
Nukewatch co-director,
740 Round Lake Rd., Luck, WI 54853, 715-472-4185

Unsafe Operation at Kewaunee Power Station:

January 12, 2007

A turbine and reactor trip at Kewaunee, now owned and operated by Dominion Resources Inc. of Richmond, Virginia, was caused by a loss of auto stop oil pressure on the main turbine. Following the trip one of the moisture separators associated with the main turbine had its associated steam inlet valve fail open which resulted in contaminated steam being vented to the environment. (NRC Event Number 43096, January 12, 2007)

August 14, 2006

The NRC announced that groundwater beneath the Kewaunee Power Station is contaminated with radioactive tritium. The NRC said the event was of "possible safety or public interest significance." Reactor staff detected measurable tritium in groundwater at several locations beneath the auxiliary and turbine buildings on Aug. 9. The contaminated water had leaked into four shafts beneath the two buildings which are used to measure possible settling of the structures. The shafts are not interconnected

and indicate the presence of a large amount of contaminated water. The source of the 1-gallon-every-5-minutes leak is still unknown.

— NRC Preliminary Notification of Event or Unusual Occurrence, No. PNO-III-06-019, Aug. 14, 2006

March 20, 2006

The Kewaunee reactor faces increased oversight from the NRC after being cited for two safety violations; one concerns failure to properly analyze the impact of flooding, and another involving a design flaw affecting the reactor's backup cooling water system. The NRC said in a letter to owner/operator Dominion Resources that the facility had a "moderate degradation in safety performance" last year (2005) while it was shutdown for five months.

— *Milwaukee Journal Sentinel*, March 20, 2006

November 29, 2005

A reactor trip at Kewaunee followed a Main Feedwater pump trip. All three Auxiliary Feedwater pumps automatically started due to low Steam Generator level. The reactor had been stabilized at Hot Shutdown. "There are no known primary to secondary leaks," the operators said, not ruling out an *unknown* primary to secondary leak. "All safety related buses are powered from offsite power," the company said.

— Notification to NRC, notice date November 29, 2005; event date November 28, 2005.

February 23, 2005

The Kewaunee reactor was shutdown when all three auxiliary feedwater pumps were declared inoperable. During the shutdown to fix the problem, an automatic reactor trip was caused by low water in the "B" Steam Generator. Another problem occurred when at least 1,000 gallons of service water, which is water drawn from Lake Michigan, entered the steam generators and had to be flushed out.

— Preliminary Notification of Event or Unusual Occurrence to NRC, PNO-III-05-003, Doc. 50-305, Feb. 23, 2005

October 30, 2004

A worker was contaminated inside the Kewaunee reactor and was rushed to the hospital after immediate decontamination attempts failed. The NRC said it did not know what isotopes had been involved.

— NRC Notification, date October 30, 2004; NRC Region 3 phone interview, Nov. 16, 2004

June 5, 2001

Kewaunee's reactor was shut down when *both* the computer Safety Parameter Display System and the Emergency Response Data System failed. The operators did not know the status of "emergency response availability."

— NRC Event Number 38052, June 5, 2001

September 21, 1996

The Kewaunee reactor was shut down when "more than expected" corroded steam tubes were discovered.

— *Milwaukee Journal Sentinel*, February 26, 1997