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To: Nuclear Regulatory Commission:

**Comments for the environmental review of the relicensing of Hope Creek Docket No. 50-354 License No. NPF-57 PSEG Nuclear, LLC**

The UNPLUG Salem Campaign is a network of organizations and individuals that act as a public health and nuclear safety watchdog for PSEG's three nuclear power plants.

This letter concerns the proposed relicensing of Hope Creek. We oppose extending the license of this nuclear plant. We also oppose the process by which decisions on relicensing are made. This process makes it virtually impossible for most individuals and many organizations to participate. In addition, because only certain issues are deemed acceptable by the NRC for submission as contentions, many issues of safety and health are not even looked at by NRC in making their decision.

We also oppose relicensing a nuclear plant twenty years before its license is up for renewal.

If the NRC can give Oyster Creek a 20 year extension, even though that nuclear plant could not be built under today's standards, and is a meltdown waiting to happen, it is clear that the relicensing process for Hope Creek will be nothing more than paperwork and rubber stamping.

However, it is important to put our concerns on the record, even though we do not expect NRC to act on any of them.

Here are areas that NRC should look at and then deny Hope Creek a 20 year extension:

(1) Hope Creek has leaked hydrazine into the Delaware Bay.

(2) The electrical system that connects Hope Creek to the grid is old and has had a

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number of failures, including transformer failures.

(3) PSEG has a spotty record when it comes to keeping diesel generators working. This is a concern because all three nuclear plants rely on diesel generators if offsite power is interrupted.

(4) PSEG has a serious Safety Conscious Work Environment (SCWE) and Safety Culture problem. This has been a chronic problem at all 3 of PSEG's plants, and continues to show up in NRC inspections under "cross-cutting issues of human performance". One key example at Hope Creek was the loss of 5000 gallons of cooling water, due to human error. This event could have escalated into a TMI-type of situation.

(5) Hope Creek is vulnerable to a severe earthquake because Artificial Island is built on compacted mud, and its pilings do not reach bedrock.

(6) Because Yucca Mountain, the national depository for spent nuclear fuel, will not be operative, Lower Alloways Creek will become, and actually is now, a long term nuclear waste dump, which violates the zoning board agreement between PSEG and Lower Alloways.

(7) Hope Creek has buried pipes and electrical conduits that have not been inspected and, based on other nuclear plants, may be leaking tritium or in danger of electrical shorts happening.

(8) The Evacuation Plan for Salem/Hope Creek is based on faulty assumptions and would not work under many scenarios, including a fast acting radiation release and multiple releases. Under worst case scenarios, thousands of people within the 10 and 50 mile zones would die from radiation exposure.

(9) Hope Creek emits continual amounts of low level radiation and radionuclides, which contribute to the cancer cases and immune system disorders in the 50 mile zone around Artificial Island.

(10) Hope Creek remains a prime terrorist target, and there are many ways terrorists could prevail, only one of which will I list here.

(11) Hope Creek's Spent Fuel Pool is above ground and not protected by containment. It is a prime terrorists target. If the water in the Pool drains out, there would be massive radiation releases.

(12) If NRC approves the relicensing of Hope Creek, the people of South Jersey and Delaware will become unwitting guinea pigs in NRC's grand experiment to find out if aging nuclear plants actually can last another 20 years or not.

What should be done:

Hope Creek should be decommissioned at the end of its 40 year license. Affected employees should be relocated and retrained by PSEG. Artificial Island should be turned into a wind power and solar power "park" to produce some of the electrical energy formerly produced by the nuclear plants.

Sincerely,

Norm Cohen  
Coordinator, The UNPLUG Salem Campaign

emailed to NRC 11/29/09