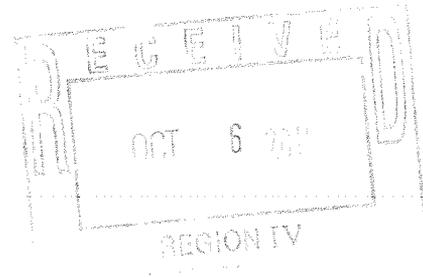




**SIERRA
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October 2, 2011

Mr. Elmo E. Collins
Regional Administrator
Nuclear Regulatory Commission Region IV
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011

Re: Ft. Calhoun Nuclear Station Action Plan

Dear Mr. Collins:

I am writing to you on behalf of the Iowa Chapter of the Sierra Club and our approximately 5,000 members. I have reviewed the Ft. Calhoun Nuclear Station Action Plan and your agency's Confirmatory Action Letter. Thanks very much to Ft. Calhoun Resident Inspector John Kirkland for providing me with these documents. After reviewing these documents I have the following comments.

As a general comment concerning the Action Plan, we believe your agency should periodically monitor the activities of OPPD as they purport to carry out the items in the Action Plan, and that your agency inspect the work done. There is understandably a desire on the part of OPPD to get the work done as quickly and expediently as possible. This may result in actions that do not assure the safe and reliable restart of the plant that is required. After your agency has monitored and inspected the work done pursuant to the Action Plan, we would expect a report from your agency made available to the public before the plant is allowed to restart.

Item 1.2, Plant and Facility Restoration, calls for some evaluation reports concerning damage to the facility. These reports should be available to the public immediately upon issuance. This section of the Action Plan then mentions biohazard and environmental issues, with those issues being identified and resolved or corrected. There should also be evaluation reports, available to the public, on those

issues as well. Finally, this item calls for repairs to be completed. These repairs must be inspected by the NRC and an inspection report made available to the public.

In Item 1.4, Electric Distribution System, for several issues the goal is described as an inspection punch list. A punch list is simply a "to-do" list. The goal should be actual repairs and an evaluation of those repairs.

Item 2.2 concerns system health assessments. The goals for the issues in this item are assessment reports, and the overall objective is described as identifying actions required to restore system health. The OPPD assessment form is just a "fill-in-the-blank" form with no narrative to determine what the problems are and what is needed to address them. The NRC should do its own inspection and reports, made available to the public. Furthermore, there should be more than an assessment of system health. There should be actual correction of the problems.

Item 3.1, Engineering Program Reviews, consists of a spreadsheet that doesn't really tell us much of anything. The NRC should monitor and inspect the items on the spreadsheet. Of special attention should be the spreadsheet items where the first question (did any components come in contact with flood water) is answered with a yes and the second question (is contact with river water normal for that component) is answered with a no. Those components are listed as air operated, large motors, dry fuel storage, cables & connections, and groundwater protection.

Item 3.2, Underground Cable Assessment, appears to be an important issue that is just being addressed with reports from OPPD, with no remedial action. This needs closer review by NRC.

Item 3.3, Underground Piping and Assessment, appears to be an extremely critical issue. The inspection and repair of damaged piping must be monitored and reviewed closely by NRC.

Item 3.4 concerns power supply service life. The Action Plan describes much of the equipment as too old and in disrepair. But the goals listed do not seem to include actual repair or replacement of this equipment. The NRC must require repair and replacement.

Item 4.1, Geotechnical and Structural Assessment, is also a critical issue. But, as with other items, there is no indication that OPPD plans to do any more than assess the situation. There must be a requirement that any problems be corrected.

Item 4.3, Plant Design for Flood Control, is another significant issue. The NRC must closely monitor and review OPPD's actions on this issue.

For Item 4.4, External Flood Design, the Action Plan discusses reviewing the design basis for the plant, but the Plan does not indicate that any changes will actually be made. The NRC must ensure that any needed changes are made.

Item 4.5, High Energy Line Remediation, will also need close NRC scrutiny. Again, it appears as though all OPPD contemplates with this issue is to evaluate the problem but not do anything to remedy the problem, the title of this item notwithstanding.

Item 4.6 is supposed to address significant design issues not covered by other items. The entries in the Plan on this issue are skimpy. The NRC needs to give this part of the Plan close scrutiny also.

Item 5.2, Field Monitoring and Environmental Monitoring, is also extremely important. The NRC must be actively involved in monitoring and reviewing what OPPD does in this regard.

Thank you for considering these comments. We believe the NRC must be actively involved in ensuring that the Action Plan is carried out and that all steps are taken to make the Ft. Calhoun Station safe and reliable before bringing it back on line. It is also important to allow the public to be involved throughout the process.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Wallace L. Taylor".

Wallace L. Taylor
Legal Chair
Sierra Club Iowa Chapter