Vaidya, Bhalchandra

From: Sally Jane Gellert [SJGUU@aol.com]
Sent: Saturday, June 02, 2012 1:46 PM
To: Vaidya, Bhalchandra
Subject: In the Matter of the James A. FitzPatrick Nuclear Plant in Scriba, New York

Mr. James Borchardt
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
VIA email to Bhalchandra K. Vaidya, NRC Petition Manager

In the Matter of the James A. FitzPatrick Nuclear Plant in Scriba, New York

Dear Mr. Borchardt:

I wish to co-petition with the Alliance for a Green Economy and Beyond Nuclear's March 9, 2012 emergency enforcement petition to suspend the operation of the James A. FitzPatrick Nuclear Plant.

· The FitzPatrick plant is the only GE Mark I boiling water reactor in the US that did not install a Direct Torus Vent System as requested by the NRC in 1989 and instead, to save money, relies upon a "pre-existing" venting system that is not fully hardened against a severe accident.

· In deciding not to install such a vent, the FitzPatrick operator and the NRC relied upon assumptions that now place public health and safety at an undue risk.

· The hydrogen explosions at the Fukushima reactors show the dangers and unacceptable consequences posed by the current FitzPatrick severe accident venting plan, since the plan was approved on the assumptions that venting would prevent containment failure, and that there are "no likely" ignition sources along the vent path. Neither of these assumptions was correct during the Fukushima nuclear catastrophe.

· Subsequent to the Fukushima accident, the NRC inspected FitzPatrick and identified a "vulnerability, in that current procedures do not address hydrogen considerations" during a severe accident.

Therefore, I request NRC immediately suspend the FitzPatrick operating license until the following emergency enforcement actions are approved by the NRC:

1) Public hearings should be held on the continued operation of Entergy Nuclear Operations' Fitzpatrick plant and the adequacy of its plan to vent through a pre-existing path into the adjacent Standby Gas Treatment System building, blowing off the double doors to release a radiological accident to the outside environment at ground level. The public must be afforded due process to address the unacceptable risks to public health and safety posed by the FitzPatrick severe accident plan.

2) Entergy Nuclear Operations should publicly document for independent review its post-Fukushima re-analysis for the reliability and capability of the FitzPatrick pre-existing containment vent system.

· The analysis should include the reassessment of all assumptions regarding the reliability of the pre-existing containment venting and specifically address non-conservative assumptions behind the cost-benefit analysis used to justify not installing a fully hardened vent system.

·It should also include a reassessment of the assumption of "no likely ignition points" during emergency venting that would otherwise present catastrophic consequences associated with the detonation of hydrogen gas and the release of radioactivity generated during a severe accident.

I wish the NRC to process my request using the 2.206 process, and I understand that under this process, the contents of this message and my identity will be made public.

The Alliance for a Green Economy is my point of contact for this petition, and their organizer, Jessica Azulay, will keep me informed about the developments of the petition and the opportunity to participate in a public meeting with the NRC Petition Review Board.

Thank you

Sally Jane Gellert
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