



CITY OF NEWBURYPORT

CITY COUNCIL

NEWBURYPORT CITY HALL
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January 4, 2016

Stephen Burns, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Chairman Burns:

We, Sharif Zeid and Gregory Earls, have just been sworn in to serve on City Council of Newburyport, MA as Councillor Ward One and Councillor-At-Large respectively.

Newburyport is located eight miles from Seabrook Station, within the plant's 10-mile emergency evacuation zone. As city councilors, our most basic responsibility is to assure the safety and health of Newburyport's residents. We firmly believe that the Seabrook nuclear reactor poses an unacceptable risk to the lives and livelihood of the people of Newburyport and New England.

On behalf of public safety, we call upon the U.S. Nuclear Regulatory Commission (NRC) to shut down the Seabrook Station nuclear reactor by withdrawing its license to operate.

In doing so, we stand shoulder-to-shoulder with local and state representatives throughout the entire Massachusetts evacuation zone who have called for Seabrook plant shutdown.¹

Specifically, we are concerned about 5 key issues

¹These include four members of the Newburyport City Council including Ed Cameron, Barry Connell, Robert Cronin, and Allison Heartquist (Letter to NRC, August 11, 2015), Freeman Condon Chairman of the Salisbury Board of Selectmen (Letter to NRC, Sept. 9, 2015), and Anne Ferguson, a member of the Amesbury City Council (Letter to NRC, Oct. 23, 2015), as well as State Senator Kathleen O'Connor Ives and State Representative Michael Costello (former) of the First Essex Districts (Announcement at NRC Public Forum, Dec. 18., 2013) who have called upon the NRC to shut down Seabrook Station on behalf of public safety

- (1) Seabrook Station is at risk of a nuclear incident due to concrete degradation throughout the plant's foundation and safety structures, including the building that houses the nuclear reactor.
- (2) Should an accident, incident, or act of terrorism threatening or leading to a radiation release² occur, a safe, timely, and humane evacuation would not be possible. This is particularly true given Newburyport's portion of Plum Island geography in Ward 1, which is served by only one road.
- (3) We question the validity of the studies being conducted with regard to the alkali-silica reaction (ASR) problem as these tests are being conducted on replica concrete.
- (4) We have serious concerns given the impossibility of inspecting every square inch of the concrete at the Seabrook Station. As such, we feel there will never be a true analysis of the depth and breadth of the ASR issue.
- (5) That the ASR issue is uncharted and unknown territory for a US based nuclear plant and is a relative unknown worldwide. Any potential mitigation that is discovered would be based on replica testing and would never have been tested in an operational nuclear plant.

The future of Seabrook Station uncertain

In this context, the relicensing of Seabrook Station involves unprecedented circumstances that make the outcome of relicensing uncertain, possibly more than any nuclear plant in U.S. history.³

The most fundamental challenge to its relicensing is that the plant is plagued by alkali-silica reaction or ASR. ASR is a completely novel problem to any US nuclear power plant, and is novel to the NRC staff as well. Both the plant staff and the NRC are operating in uncharted waters.

NextEra is conducting a study to assess the progression of ASR which has been found throughout the plant's concrete foundation and key safety structures. But, since ASR was first discovered at the plant, the NRC has announced that there is "no known way" to either remedy existing ASR or stop the progression of the concrete degradation it causes. It is also our understanding that the complete extent of the ASR issue is unknown due to the impossibility of inspecting every square inch of concrete in the plant.

²Radiation could be released into the air from the building that houses the nuclear reactor or other structures, or from the high-level "spent" fuel pool that is located at the Seabrook plant.

³NextEra, the owner of Seabrook Station filed for a 20-year extension of its operating license from 2030 to 2050 in 2010.

While we are respectful of NextEra's efforts to study this issue the reality is that the tests are being done on replica samples as testing the actual plant would be impossible, for obvious reasons. When dealing with an issue as sensitive as nuclear power the bar must be set incredibly high just in the same way that vehicle crash tests are done with actual vehicles and not with replicas or close approximations.

Even if the NextEra study finds that ASR can be managed, the NRC may find that the results are not acceptable. For example, the NRC may determine that "replica" samples created by NextEra to accelerate the study process may not be an adequate substitute for actual concrete used at the plant or that potential mitigation measures have not been tested on the actual concrete or at the actual plant. Since the findings on ASR are pivotal to the plant's future, the NRC may close Seabrook Station.

In any case, Seabrook Station is far too risky for continued operation and should be closed.

The NRC Should Convene Meetings on Seabrook Station in Massachusetts Too

Finally, we strongly urge the NRC to convene the spring 2016 Annual Assessment Meeting on Seabrook Station in Massachusetts. These important meetings have never been held in Massachusetts, although sixty thousand citizens reside in the Massachusetts evacuation zone. It would be appropriate and fair to convene the next public meeting in Massachusetts to provide better access to our residents and elected officials. This issue supersedes state lines given Seabrook Station's location. It would be appreciated if the NRC, as a national commission, would be inclusive in this process so that all voices are heard and substantive due process can be observed.

To be clear, we are not opposed to nuclear power, we are however opposed to the unacceptable risks posed by Seabrook Station. Therefore, we advocate the immediate shutdown of this particular nuclear power plant.

Respectfully,



Sharif Zeid, Councillor Ward 1



Gregory Earls, Councillor-At-Large

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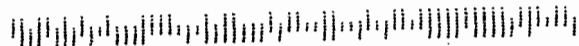


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