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SUBJECT: Requests that NRC act conservatively & force NMP to perform mid-cycle insp agreed to during 1997 refueling.

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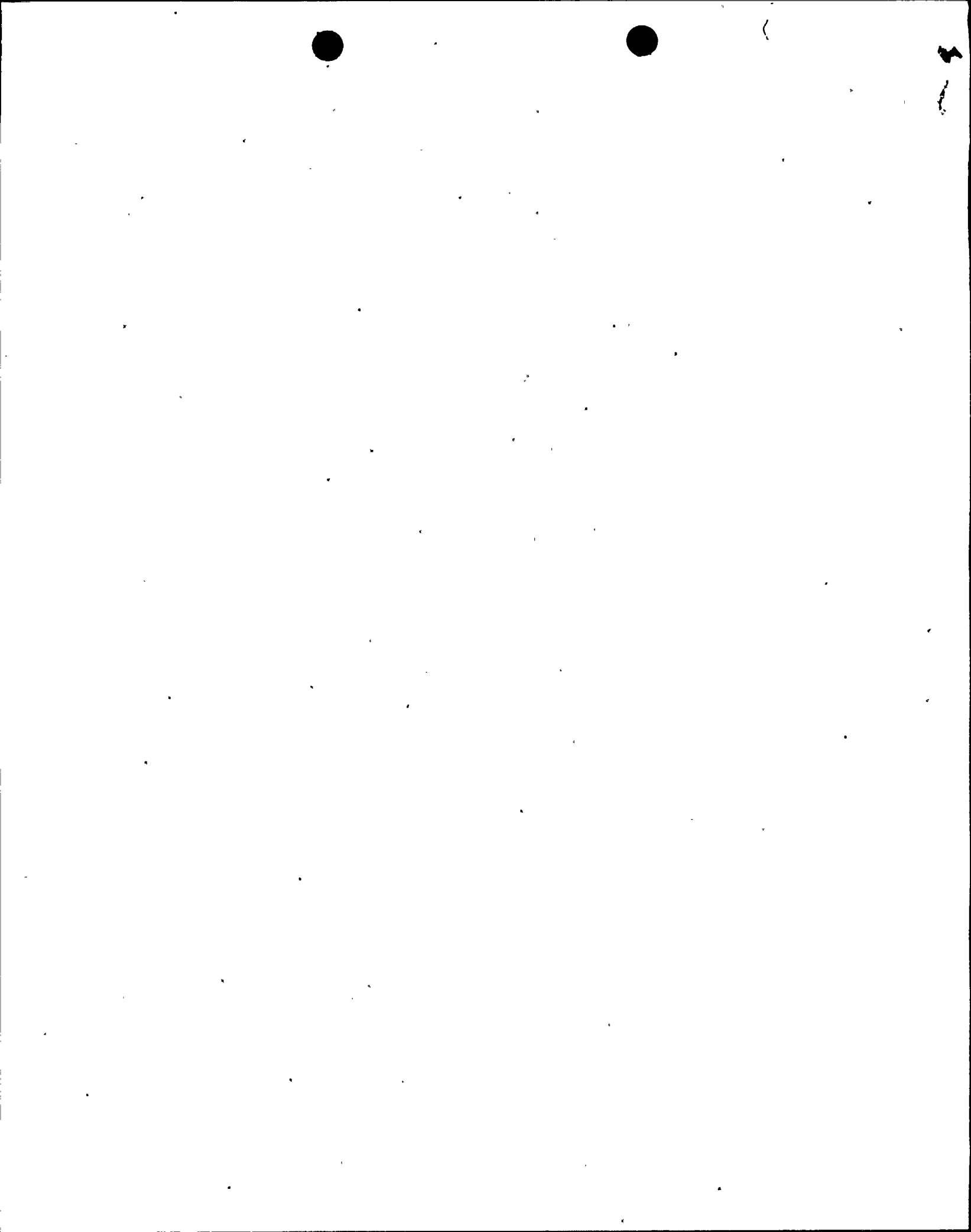
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CITIZENS AWARENESS NETWORK

September 29, 1998

Hubert Miller
USNRC
Region I-ORA
475 Allendale Rd
King of Prussia, PA 19406

Dear Mr. Miller,

By 1991, the Yankee Rowe reactor pressure vessel was operating with a degree of embrittlement outside of its technical specifications and with deteriorating safety margins. Embrittlement of Rowe's vessel was faster than predicted. After expending over twenty million dollars to develop techniques to obtain boat samples of Rowe's vessel material, the utility shut the reactor when it was unable to get a guarantee from NRC that Rowe could continue to operate for two years whatever the sampling revealed.

When the integrity of Yankee Rowe's vessel became an issue, NRC violated its own regulations by allowing Yankee Atomic to run the Rowe reactor with a 1 in 10,000 chance of an accident instead of 1 in 1,000,000 as required by NRC regulations. When our community realized that the agency was willing to gamble with our lives, ordinary citizens forced the closure of Yankee Rowe to protect our children from further experiments.

The lesson learned from Rowe: all reactors must undergo baseline inspections of their vessels. NRC stated on May 12, 1997 at its Meeting with Boiling Water Reactor Vessels and Internals Project and NRC Staff that "Reactor pressure vessel failure is an incredible event ... The engineered safety features of the plants are not designed to cope with reactor pressure vessel failure. They are not specifically designed for catastrophic failure or leakage. The consequences of such an event have not ... been fully evaluated."

NRC staff continued "Pressure vessel integrity must be maintained at the highest quality... NRC must maintain a "defense in depth and this is accomplished through inspections and evaluation of inspection results to understand the current condition of the reactor vessel and any potential future degradation modes. Prediction of degradation in other components has not always been ... reliable. What (did) identify ... degradation were inspections and this includes stress corrosion cracking. The job is to identify things that haven't been anticipated..." Since Rowe, seven years of advancement in inspection capability have been made in sampling and scoping techniques.

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THE EXPERIMENT IS OVER
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In 1997 Nine Mile Point did a baseline inspection. It inspected **only 70%** not 100% of its vessel. Japan, Spain, and Sweden require 100% inspections. It inspected parts of the core shroud that is 17 feet high and 1.5 inches thick. There were surprises- vertical cracking and cracking on a newly installed tie rod-fix for horizontal weld cracking. The vertical cracking was both subsurface and surface. In fact, cracking exposed to the environment has the potential for more aggressive growth.

In one vertical weld 90" long, cracking was virtually the length of the weld with 80% cracking through the 1.5-inch thick wall. Another weld was 70" with 80% through wall cracking. This severity of cracking was found with **only a 70%** inspection. After finding this unexpected cracking, NRC required a mid-cycle inspection. Niagara Mohawk Power Corporation (NMPC) now requests that shroud inspection be deferred until its next refueling outage claiming that "good water chemistry" can assure integrity of the vessel and minimize progress in degradation of weld cracking. This may save money for NMPC, but it does not protect the people of New York.

The unforeseen accelerated degradation of PWR and BWR vessels through embrittlement and stress corrosion cracking presents us with catastrophic possibilities. In fact, in a briefing to the Commission, NRC staff stated that stress corrosion cracking could "affect plants regardless of how well they have controlled their water chemistry." (NRC Briefing by Staff on Steam Generator Issues; February 27, 1996.) The only way for NRC staff to understand the process is through repeated inspections and 100% inspection of vessels, as other countries require.

If NRC permits the utility to break its commitment to a mid-cycle inspection, it will be making a political decision, not a decision based on good science. This decision would abdicate NRC's mandate to protect the worker and public health and safety and the environment.

CAN requests that NRC act conservatively, adhere to its mandate, and force the licensee to perform the mid-cycle inspection agreed up during the 1997 refueling.

Sincerely,

Deborah Katz
President
Citizens Awareness Network

Cc: Samuel J. Collins, Head of Nuclear Reactor Regulation
Darl S. Hood, Nine Mile Point Project Manager
James T. Wiggins, Director of Reactor Safety
David Lochbaum, Safety Engineer, Union of Concerned Scientists
Paul Gunter, Director, Reactor Watchdog Project
Jonathan Block, Esquire

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