

February 23, 2017

Mr. Daniel Dorman
Regional Administrator, Region I
US Nuclear Regulatory Commission
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

Mr. Dorman:

It has come to my attention that representatives from the Nuclear Regulatory Commission (NRC) regional offices in King of Prussia, PA and NRC headquarters in Washington D.C., recently briefed Connecticut Department of Energy and Environmental Protection (hence forth the Agency) staff, including Jeffrey Semancik, State Liaison Officer and Director of the Agency's Radiation Division, concerning manufacturing irregularities identified at Areva's Creusot facility, including forgings provided by Areva as components in U.S power plants, and the susceptibility of subject components to carbon segregation issues including, specifically, the pressurizer at Millstone Power Station Unit 2 in Waterford, Connecticut. In this briefing and as noted on the NRC's January 10, 2017 website posting, "Update on Quality Assurance Issues in France," the NRC indicated, "We are confident at this time that there are no safety concerns for U.S. nuclear power plants raised by the investigations in France." This discussion gave us a better understanding of the scope of the potential public health and safety risks and allowed the Agency to provide information acquired through its review of the issues, articulate the state's interests, and make recommendations for ensuring the quality of components used in the nuclear power plants in the state. (Conn. Gen. Stat. § 22a-135 (Rev. 2011)).

While recognizing the regulatory authority of the NRC over commercial nuclear power facilities, the State of Connecticut maintains a very serious interest in matters that could affect the health and safety of the public and the natural resources of the state. The Agency has a broad statutory charge to ensure that the state's citizens and natural resources, particularly surface water resources, are fully protected from any potential contamination by radioisotopes released from nuclear facilities in Connecticut. In light of (1) the Agency's statutory charge; (2) the potential public health and safety implications of any increase in the probability of failures associated with reactor coolant pressure boundary components; (3) technical consideration of the French Nuclear Safety Authority's assessment that resulted in the regulatorily required shutdowns of affected French nuclear units, and; (4) public inquiries to the state, the Agency recommends, absent verifiable evidence that the Millstone 2 pressurizer is not subject to manufacturing issues potentially affecting its material properties:

1. The Agency supports Dominion's efforts to provide additional assurance of safety during the planned spring 2017 Millstone 2 refueling and maintenance outage through nondestructive examination of areas of the Millstone 2 pressurizer with the potential for high carbon concentration in conjunction with analysis that the component is not vulnerable to fracture

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based upon material properties determined from component testing or bounding values from testing other components manufactured by the Creusot facility.

2. Any testing or analyses conducted to evaluate the susceptibility of the Millstone 2 pressurizer to carbon segregation should be independently verified by technical experts not associated with the manufacturer, Areva.
3. The NRC should discuss its assessment of safety and any planned course of action as part of the presentation at Connecticut's Nuclear Energy Advisory Council (NEAC) first quarter 2017 public meeting.
4. The Agency requests that NRC staff conduct a "government to government" meeting in April 2017 to brief the Agency's staff on the NRC's assessment of the impact of the manufacturing irregularities to the continued safe operation of Millstone 2.

I appreciate this opportunity to express the safety, environmental and transparency concerns of the state. This level of communication between relevant government agencies will measurably enhance our efforts to keep the public safe and informed, as well as to preserve and protect the state's important natural resources and environment consistent with the Agency's legal obligations. I look forward to your response.

Sincerely,



Michael Sullivan
Deputy Commissioner
Environmental Quality Branch

Cc: Robert Klee, Commissioner, DEEP
Robert Kaliszewski, Deputy Commissioner for Environmental Quality, DEEP (effective 3/1/2017)
Jeffrey Semancik, State Liaison Officer, DEEP
Representative Kevin Ryan, Chairperson NEAC