

BUSINESSMEN FOR THE PUBLIC INTEREST

DAVID DINSMORE COMEY
DIRECTOR OF ENVIRONMENTAL RESEARCH

*SUITE 1001
109 N. DEARBORN ST.
CHICAGO, IL 60602
TELEPHONE 312-641-3570

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Dr. Glenn Seaborg, Chairman
U.S. Atomic Energy Commission
Washington, D.C. 20545

Dear Dr. Seaborg:

We have reviewed the Idaho Nuclear Safety Reports on Tests 845-850 of the Semiscale Blowdown and ECC Project, and have compared them with the Water Reactor Safety Program Plan and other AEC documents.

Warnings that ECC water might bypass the core and be blown out the primary system break appear explicitly at page 90 of the Ergen report, page 49 of NSIC-24, and pages 2, 19 and 20 of IN-1384. Moreover, the Leidenfrost effect is a well-known phenomenon in two-phase flow theory.

In view of the fact that the tests verified the accuracy of these test objectives, we feel that the Commission is wrong in regarding the test results as "surprising" or "unexpected."

We are particularly disturbed by an AEC press release, dated May 28, 1971, which attempts to denigrate the tests by saying:

The recent small mock-up tests at NRTS were not designed to represent the response of an actual operating nuclear power plant to a loss of coolant accident. There were significant differences in the experimental system which was tested as compared to an operating reactor.

In view of the fact that the blowdown test data from that same facility has been used to support license applications, we do not see how the Commission can have its cake and eat it too. Either the facility does "closely model commercial plant

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ECC systems" (page 27 of IN-1384), in which case the ECC systems on commercial PWR's do not work, or the test results on blowdown used in previous license applications must be cast out and the matter remanded for de novo consideration, which would entail holding new hearings on those license applications.

In view of the crucial nature of this problem, we believe the only prudent course for the Commission to follow, in addition to its expressed intention to hold up licensing new plants, would be to suspend the licenses, until the ECC system has been experimentally verified, of the reactors named on the attached list.

We ask the Commission to suspend these licenses on the grounds that the assurance of no undue risk to the public health and safety demands that no other course be followed by the Commission.

Sincerely,

Rand Winmore Coney

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OPERATING LICENSES TO BE SUSPENDED

<u>Name of Plant</u>	<u>Location</u>	<u>Operator</u>
Connecticut Yankee	Haddam Neck, CT	Connecticut Yankee Atomic Power Co.
Dresden 2, 3	Grundy County, IL	Commonwealth Edison Co.
Ginna	Ontario, NY	Rochester Gas and Electric Co.
Monticello	Monticello, MN	Northern States Power Co.
Millstone 1	Millstone Point, CT	Connecticut Light and Power Co.
Nine Mile Point	Oswego, NY	Niagara Mohawk Power Co.
Oyster Creek	Oyster Creek, NJ	Jersey Central Power and Light Co.
Point Beach 1	Two Creeks, WI	Wisconsin Electric Power Co.
Robinson 2	Hartsville, SC	Carolina Power and Light Co.
San Onofre	Camp Pendleton, CA	Southern California Edison Co.

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