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 RECIP. NAME      RECIPIENT AFFILIATION  
 MURLEY, T.E.      Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Informs that author would like to have independent review of evaluation stating that HPCI sys not necessary at facility, in response to Director's Decision DD-93-10 under 10CFR2.206.

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October 13, 1993

Nuclear Regulatory Commission  
C/O Thomas E. Murley  
Director, Office of Nuclear Reactor Regulation  
Washington, DC 20555-0001

50-220

Ben L. Ridings  
P.O. Box 1101  
Kingston, TN 37763

Reference: Docket 50-220 DD-93-10  
Director's Decision Under 10CFR2.206

Dear Mr. Murley:

Lets make one note perfectly clear from the outset. The NRC has had numerous reviews of the license, IST and Surveillance programs of the NMP-1 facility. After these reviews the NRC certified this plant met all the requirements of the license. Everytime this license is reviewed and certified correct, numerous serious errors still existed. After all of these reviews and operation of this plant for twenty four years, you feel it is prudent to allow this plant two years to correct their license of the many gross safety related deficiencies that you admit exist. Further, every surveillance, emergency plan and operation procedure has been reviewed numerous times by "qualified individuals". How could these procedures possibly be correct when the guiding document (TS, FSAR) is filled with contradicting statements about what valve gets what signals from what instrument. That's the type of review that the plant has received, not only from its review personel but from the NRC as well. I can't count how many times you people have been wrong.

IN THE INTEREST OF PUBLIC SAFETY, since I think your opinion is dreadfully wrong and the NRC has been wrong on many issues, I would like to have an independent review (probably the Union of Concerned Scientist) of the evaluation stating that the HPCI system is not necessary at NMP-1, although the design basis requires it. On page 4 of your decision, you stated that "on March 24, 1969, the AEC staff issued a report" exempting NMP-1 from the general design criteria. Please provide me a copy of this safety evaluation and all documents supporting this claim. I will send this information to be reviewed by expert containment specialists. Also send documentation which allows for use of a closed loop as the outboard barrier for a containment penetration. Currently, NMP-1 has miles of primary piping outside of the containment building yet the license requires the outboard valve be within 40 ft of the penetration to reduce the possibility being sheared by falling objects. With the additional possibility of pipe shearing, an unreviewed safety question exists. When it is understood that a closed loop cannot be used as an outboard barrier, you will find that NMP-1 cannot meet the leakage requirements of Appendix J.

Maybe we will both learn something from this review. It is my opinion that AEC evaluation was a political favor for whatever reason. In the past, the NRC has granted exemptions for regulatory requirements in order to settle dispute in grey areas. As a matter of fact, if one took

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all the exemptions granted by the NRC and applied this against a single license, very few requirements would remain.

Last, on July 8, 1993, NRC Chairman Ivan Selin stated on public television that the NRC has no program in place to protect witnesses who come forward with safety concerns. Selin stated the NRC relied on the Department of Labor to make decisions on conditions of employment. This is in direct violation of NRC Form 3, on public display, at every nuclear site in the United States. I have been personally damaged for the failure of the NRC to have in place a protection program. I intend to file a law suit shortly on this issue. Should the NRC wish to discuss this matter prior to a law suit, I suggest they contact me immediately.

Respectfully submitted,

  
Ben L. Ridings

