

Recd 5/7/79

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In Re: Maine Yankee Atomic Power Company

Docket No. 50-309

REQUEST FOR ISSUANCE OF ORDER TO SHOW CAUSE

TO: Director of Office of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Safe Power for Maine, and Nancy Crane DeWick, hereby request, pursuant to Section 2.206 of the Rules of Practice and Procedure of the Nuclear Regulatory Commission, that the Director of the Office of Inspection and Enforcement initiate, pursuant to Section 2.202 of said Rules a proceeding to modify, suspend, or revoke the license of Maine Yankee Atomic Power Company for the operation of a nuclear powered steam generating station at Wiscasset, Maine, by serving on the licensee an order to show cause for the reasons as more specifically set forth below:

1. Safe Power for Maine is a nonprofit membership corporation comprised of approximately 2,300 year-round residents of the State of Maine. Safe Power's primary and publicly announced concern is the protection of residents of the State of Maine from exposure to dangers associated with use of nuclear power. In implementation of its purposes, it has over the past five years been continuously involved with the problems of nuclear power in the State of Maine, has been publicly identified with concerns of public safety and nuclear power in Maine, has represented public

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concerns about the safety of nuclear power in Maine, has appeared as intervenor in proceedings before the Public Utilities Commission and Nuclear Regulatory Commission, has conducted meetings, programs of public education, and other activities in representation of this interest. Safe Power has vigorously represented a substantial public interest and concern over the safety of nuclear power as it presently exists in the State of Maine and as proposed in that state.

2. Nancy Crane DeWick is a resident of Woolich, Maine. Woolich, Maine is a community located in the immediate vicinity of the Maine Yankee Atomic Power station which is the subject matter of this proceeding. Ms. DeWick's home is less than 12 miles from the reactor site and she is one of a potential 200,000 people that could be exposed to serious danger within a 20-mile radius of the reactor site, depending upon the season of the year.

3. Maine Yankee Atomic Power is a licensee of the Nuclear Regulatory Commission and operates a nuclear powered electricity generating station at Wiscasset, Maine. The reactor is a pressurized water reactor engineered by Combustion Engineering.

4. On May 7, 1975, the Nuclear Regulatory Commission was informed by Virginia Electric and Power Company that an asymmetric loading on the reactor vessel support resulting from a postulated reactor coolant pipe rupture at a specific location (e.g., the vessel nozzle) had not been considered by Westinghouse or Stone and Webster in the

original design of the reactor vessel support system for North Anna, units 1 and 2. The NRC determined that a double ended offset LOCA at the vessel nozzle could cause asymmetric loading on the reactor vessel which could possibly affect the integrity of the reactor vessel support structures. This safety concern, first identified during the review of the Virginia Electric and Power Company North Anna facilities, has generic implications for other pressurized water reactors including Maine Yankee.

5. In June of 1976 the NRC requested all operating pressurized water reactor licensees to evaluate the adequacy of the reactor system components and their supports at their facilities with respect to these newly identified loads.

6. Despite frequent requests for engineering evaluation of the effect of the postulated loads upon the reactor vessel support structures at Maine Yankee, Maine Yankee has failed to supply engineering information adequate to assess the potential danger arising from the identified circumstance. On the contrary, licensee's responses to the NRC request indicated that the postulated asymmetric loads had not been considered in the design basis for the reactor vessel support system, reactor internals including the fuel, steam generator support, pump supports, emergency core cooling system lines, reactor coolant system piping, or control rod drives.

7. On January 25, 1978, the Nuclear Regulatory Commission wrote to Maine Yankee and repeated and enlarged upon its request for engineering information concerning this potential danger. Said letter required Maine Yankee

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to submit, within 90 days, a detailed schedule for providing the required evaluation. To the knowledge of the Petitioners herein, to date no such detailed schedule has been provided.

8. On March 13, 1979, this Commission ordered the Maine Yankee Atomic Power Company nuclear reactor at Wiscasset to be temporarily "shut down" pending resolution of a computer design error incident to the initial design and construction of the reactor. Maine Yankee is presently in a shut down state, although Petitioners understand that Maine Yankee may soon request that it be permitted to resume operation.

9. Resumption of operation by Maine Yankee Atomic Power Company at present and without further resolution of the potential hazard discussed in the Commission's letter of January 25, 1978 would constitute an unreasonable hazard to public safety in that:

A. Although the asserted potential likelihood of an accident of the kind which would cause the stresses postulated is low, in the absence of engineering information requested, the effect of such an occurrence cannot be evaluated and the potential danger to a large number of persons must be considered as indeterminate and thus very high.

B. The shut down of Maine Yankee for a serious initial design deficiency suggests a cumulative hazard which justifies continued shut down of Maine Yankee pending further resolution of the asymmetrical reactor vessel loading problem prior to reactor start up.

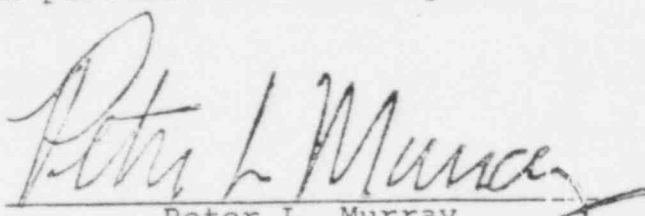
C. Other unique factors such as the geography of the area in which the reactor is located and the impending influx of summer tourists into the area increase the potential hazard. Many of the area residents live on islands and in locations which are difficult of access. There is no generally disseminated, coordinated or approved inhabitant evacuation plan covering the surrounds of Maine Yankee. The residents of the area are completely exposed to an indeterminate hazard.

D. Continuing the shut down of the Maine Yankee reactor would inspire the management of Maine Yankee with greater alacrity to complete the investigation necessary to evaluate the integrity of the support structures and the potential hazard of the kind postulated in the January 25, 1978 letter.

10. Safe Power for Maine and Nancy Crane DeWick stand ready to appear in and to assist the Commission in any show cause proceeding initiated pursuant to this request.

Respectfully submitted,

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