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## SUBJECT: Seabrook readiness for operation

Dear Commissioners:

On February 1, 1990, I wrote to you on behalf of Intervenors New England Coalition on Nuclear Pollution, the Seacoast Anti-Pollution League, and the Attorney General of Massachusetts, to alert you to serious safety problems raised by numerous recent NRC Staff inspection and examination reports. In our view, the Staff's reports reveal a pattern of equipment failures, operator incompetence, and procedural deficiencies that demonstrate the Seabrook reactor is not ready to operate at full power.

In one of these inspection reports, the Staff noted that at least 61 potentially defective Rosemount transmitters are installed in the Seabrook reactor. 1 These transmitters, at least some of which are used in safety related applications at Seabrook, may fail as a result of loss of fill oil. In the inspection report, the Staff approved the Applicants' program for monitoring Models 1153 and 1154 transmitters during full power operation, with replacements to occur as "consistent with support of station activities." Id. at 18. Thus, apparently Applicants intend to operate the reactor at full power levels with the potentially defective transmitters in place.

The NRC Staff has prepared a draft bulletin, however, which states that "in some cases the failure of a transmitter that is leaking fill-oil is not detectable during operation."2 The draft

- 1 Inspection Report No. 50-443/89-13, dated January 9, 1990, at 18-19.
- 2 Draft Bulletin 90-xx, "Loss of Fill Oil in Transmitters Manufactured by Rosemount." The NRC Staff reportedly plans to

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