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JOINT COMMITTEES:
TAXATION (CHAIRMAN)
ENERGY
TRANSPORTATION

October 11, 1990

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington DC 20555
Attn: Docketing and Service Branch

Dear Sir or Madam:

I am writing in strong opposition to the proposed rule on Nuclear Power Plant License Renewal.

The proposed rule would clearly fail to adequately protect public safety -- which must be the primary mission of the Commission. In particular, the district I represent lies very close to the Yankee Atomic nuclear plant at Rowe -- a plant which is preparing to apply for a license extension until 2021 under the proposed rule, even as NRC staff are questioning whether it should be operating past 1992.

It is inconceivable to me that the Commission could suggest that a plant need not even specify what its license requires or show whether those requirements are being met, in order to be relicensed for an additional twenty years. The Commission's attitude seems to be that since everything has gone well in the past, everything will go well in the future -- an indefensible position when dealing with the aging of nuclear power plants.

Unfortunately, we know all too little about the aging at Yankee Rowe (which is, as you know, the oldest plant in the country) over the last thirty years -- let alone the next ten years. It is a frightening paradox that we know so little about plant aging (especially at Yankee Atomic), while it is of such great importance -- particularly to the thousands of people I represent -- that our actions be based on real knowledge, and not mere assumptions. It simply makes no sense to grant a license extension halfway through an operating license -- before the worst effects of aging can even be known, much less assessed.

Since the new license will effectively supersede the original license, the responsible position for the Commission would be to

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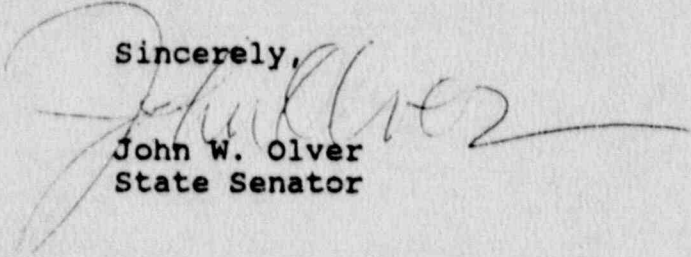
require a complete review first of whether the licensing basis provides sufficient assurance of safety, particularly in light of aging, and then whether the plant is in full compliance with its licensing basis.

Of course for the review to occur, a plant would have to first specify the complete terms of its license, another requirement which the Commission for some unknown reason does not see as necessary. This proposal that power plants need not produce the current licensing basis not only does not make sense, but it will obviate intelligent comment by interested parties.

Finally, any extension should be granted only conditionally, if at all, pending knowledge and experience gained through the end of the period of the original license. And it should be made clear that a plant must meet the current licensing basis as of the effective date of the renewal.

I hope that the Commission will incorporate such changes into the proposed rule that will serve to allay these concerns of our citizens which are so very justified.

Sincerely,



John W. Olver
State Senator