

83 Pine Street  
Brattleboro, Vt. 05301  
April 16, 1981

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Docketing and Service Branch

Dear Sir:

Please cancel your modification of 10 CFR 50.44 which would require inerting of Mark I and II BWR containments.

Under proposed rule making on Page 65467 of FR Vol. 45, No. 193, you state "While the decrease in residual risk due to inerting these containments is small, as determined by probabilistic analyses, (a) there are no significant countervailing safety disincentives; (b) the cost of inerting is small". I would like to base my arguments for not inerting on the invalidity of this statement.

Very significant countervailing safety disincentives will be created by inerting the containments of these plants (only affects Vermont Yankee and Hatch). Some examples of this hazard are:

1. Two men recently died in the inerted fuel tank on the space shuttle.
2. A few years ago, two men died in a Mark I BWR containment in India.
3. I personally know of two near-fatal accidents at nuclear facilities in New England.

In my opinion, if these plants are required to inert, you will be creating the biggest hazard in the work place that employees at these facilities will have to contend with.

The cost of installing a system to inert the containment at Vermont Yankee will be about one million dollars. Annually, inerting will cost Vermont Yankee about \$50,000 just for the nitrogen, plus an estimated one million dollars in lost capacity. This is not what I consider a small cost.

Most of the remainder of your statements of consideration refer to the TMI-2 accident, a PWR; and your conclusion is to have two BWRs inert and study PWRs to see if there is a problem. This logic is difficult for me to comprehend.

I hope you will take this information into consideration and refrain from making this change to 10 CFR 50.44. The interest of employees and the public will be served better if this change is not implemented.

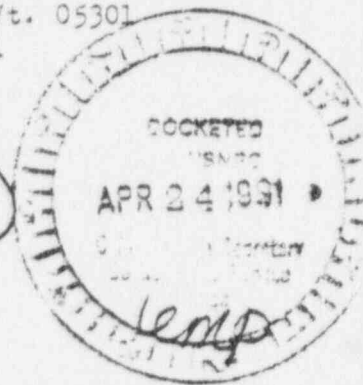
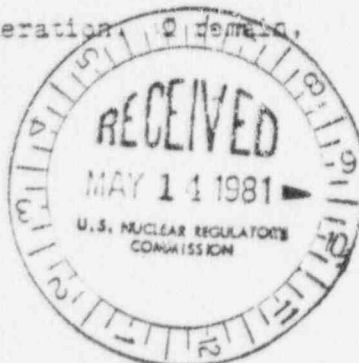
Thank you for your consideration.

Yours truly,

Bob N. Leach

BNL:rs1

cc: Senator Robert Stafford  
Senator Patrick Leahy, Rep. James Jeffords



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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

May 15, 1981

TVA BFPN TS 163



Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Denton:

In the Matter of the	)	Docket Nos.	50-259
Tennessee Valley Authority	)		50-260
			50-296

In accordance with the provisions of 10 CFR Part 50.59, we are enclosing 40 copies of a requested amendment to licenses DPR-33, DPR-52, and DPR-68 to change the technical specifications of Browns Ferry Nuclear Plant units 1, 2, and 3. The proposed changes revise the administrative controls section of the technical specifications to reflect plant organization.

In accordance with the requirements of 10 CFR Part 170.22, we have determined this proposed amendment to be Class II for unit 1 and Class I for units 2 and 3. These classifications are based on the facts that the proposed amendment is an administrative change that has no safety significance for unit 1, and the proposed amendments for units 2 and 3 are duplicates of the unit 1 proposed amendment. The remittance for \$2,000 (\$1,200 for unit 1 and \$800 for units 2 and 3) is being wired to the NRC, Attention: Licensing Fee Management Branch.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*L. M. Mills*

L. M. Mills, Manager  
Nuclear Regulation and Safety

Subscribed and sworn to before  
me this 15<sup>th</sup> day of May 1981.

Paulette H. White  
Notary Public

My Commission Expires 9-5-84

Enclosures  
cc: See page 2

THIS DOCUMENT CONTAINS  
POOR QUALITY PAGES

Mr. Harold R. Denton

May 15, 1981

cc (Enclosures):

Mr. Charles R. Christopher  
Chairman, Limestone County Commission  
P.O. Box 188  
Athens, Alabama 35611

Dr. Ira L. Myers  
State Health Officer  
State Department of Public Health  
State Office Building  
Montgomery, Alabama 36104