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50-443

June 6, 1997

Patrick D. Milano, Acting Director
Project Directorate I-3
Office of Nuclear Reactor Regulation
O-14 B 20
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Milano:

Enclosed is the Seacoast Anti-Pollution League's comment on the proposed License Amendment to Seabrook Station, Unit No. 1, public notice of which was published on 6/4/97 in the legal notices section of the Portsmouth Herald.

I telephoned 301-415-1457 by direct dialed call on this date and reached your voice mail and read SAPL's comment. When I later noted that the instructions said "by collect call", I tried twice to place a collect call to your number to resubmit our comment. Neither call was accepted. This raises a concern that other public comments may also have been attempted unsuccessfully. On this basis, SAPL would ask that the public comment period be extended.

Sincerely,

Jane Doughty

Jane Doughty
SAPL Staff

Enclosure

Via Certified Mail

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per J. McKnight



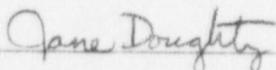
SAPL'S COMMENT ON NRC'S PROPOSED LICENSE AMENDMENT
(Public Notification of which was published in the
Legal Notices section of the Portsmouth Herald on
6/4/97)

It is the Seacoast Anti-Pollution League's position that there is a significant hazards consideration in the matter of the NRC staff's proposed amendment to the operating license at the Seabrook Station, Unit No. 1, which would amend the Seabrook Technical Specifications to explicitly identify the Westinghouse fuel assembly design at Seabrook consisting of either ZIRLO or Zircaloy-4 fuel cladding material.

There is a significant hazards consideration in this matter because it has become clear that there is a problem with the Westinghouse fuel cladding in use at Seabrook Station. The licensee has identified leaking fuel rods; two of the ZIRLO clad rods broke during refueling operations according to an event report made to the NRC on 5/31/97. This degradation of one of the principal safety barriers at the plant is a very serious matter. If root causes are not identified and remedied, there is every reason to expect that this degradation will continue in future and a condition could eventuate which could lead to serious public safety consequences. SAPL holds that the detection of a steam generator tube leak during the last operating cycle, which indicates that a second principal safety barrier at the plant is also degrading, is relevant to this matter. SAPL believes that the both the probability and consequences of previously evaluated accident scenarios are increased by plant operation with degraded fuel cladding. It is clear that plant workers are already being subjected to more hazardous working conditions as a consequence of the degraded fuel cladding. Operation of Seabrook Station with defective fuel cladding significantly reduces the margins of public safety.

SAPL holds that a hearing should be held and a thorough investigation be made to determine the root causes of existing fuel cladding degradation prior to any decisions being made to issue this license amendment and prior to plant start-up.

Submitted on 6/6/97 by:



Jane Doughty
SAPL Staff