August 10, 1999

162 Cambridge St.
Syracuse, NY 13210

Mr. Darl Hood
NRC Project Manager, Nine Mile Point Units 1 & 2
U.S. Nuclear Regulatory Commission
Mail Stop 8C2
Washington, DC 20555-0001

Dear Mr. Hood,

This letter is to confirm our conversation on July 21 about the concerns of Syracuse Anti-Nuclear Effort regarding the status of our petition 2.206 (filed on May 24), and the upcoming NRC performance review meeting on Nine Mile Point Units 1 and 2. You had called for three reasons: 1) to notify SANE that our request in the petition for a public meeting to review the safety margins of Nine Mile Point Unit 1 (NM1) was still under consideration by NRC; 2) to inquire whether SANE and other groups were still interested in a public meeting specifically devoted to the safety status of NM1; and 3) to ascertain what our concerns were regarding the reactor performance review a: ' what we hoped to see addressed in the performance review, to be scheduled in late September or early October.

We appreciate your initiative in notifying us of the status of our petition, and we are pleased that the NRC is reviewing our concerns. However, we are disappointed in the Petition Review Board's previous decision not to fully address the petition before NM1 was allowed to restart. Specifically, the PRB's assessment that our concerns, while sufficient to qualify as a petition 2.206, did not present issues that would justify postponing restart is inadequate. The concerns, as they were presented with new information and unreviewed safety issues, were directly relevant to *any* continued operation of the reactor. NM1 should not have been restarted until these safety concerns had been fully addressed. A thorough public review was warranted before restart. Since the age-related degradation continues, that review is still warranted, even if it is belated.

Since our filing of the 2.206 petition, the event reports at NM1 have only further substantiated our case that reactor safety has been compromised. Cracks were identified in the Main Drain Line (MDL) and Control Rod Stub Tubes (CRST) as a result of a hydrostatic test of the Reactor Vessel the day of the scheduled restart. The MDL leak is particularly troubling. As a small-diameter pipe, the MDL is only scheduled for inspection once every eight years. The leak, which was detected by visual inspection and not remote sensing, was fortunately discovered before restart. Had the MDL burst during operation there would be no way to stop the draining of the reactor vessel.

These cases raise two concerns: A) the NRC's "leak-before-break" model for assessing the safety of aging reactors is inadequate; and B) the problem of cracking in pipes and internals is not confined to the core shroud, but may be spreading throughout the reactor internals, pipes, and other systems. The latter represents an unanalyzed condition which is only being identified piecemeal, through incidental cases: the core shroud (1995-present), emergency core coolant condensers (1997), main drain line, and control rod stub tubes (1999). Together, however, they reveal a pattern of degradation of reactor components and systems and suggest overall embrittlement of the reactor. The condition of the core shroud, the most robust internal component, is a bellwether for the status of other reactor components and systems.

Finally, the recently released core shroud inspection results indicate that one of the welds (V-10) is experiencing a crack growth rate which is on the order of or greater than the limit set by the NRC in the

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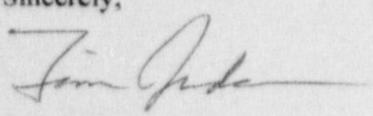
November 1998 safety evaluation. The measured values were also much greater than the CGR predicted by General Electric. In addition the large measurement error (approximately 10 microinch/hour) provides a great deal of uncertainty compared to the NRC's CGR limit of 22 microinch/hour. For safe operation the measured CGR should be at least 2 sigma below any established safety limit.

We believe the need for a public meeting to review these issues has only increased since our petition was filed. Further, we believe the plant performance review meeting would be inadequate to address our concerns. The performance review discusses operator performance for a given period of time, whereas our safety concerns focus on reactor degradation which extends across many operating cycles.

In addition to the public meeting on the NM1 core shroud, a performance review of Nine Mile Point Units 1 & 2 is also of pressing need. Nine Mile Point has experienced a rash of scrams and of coolant and electrical system failures which suggest a problem in operator training and performance. We feel it is important to the success of the performance review process that the NRC and the public be able to discern issues of operator performance and reactor integrity, and be able to distinguish their safety significance when necessary. For these reasons, we reiterate our request for a public review of the 1999 core shroud inspection and the safety status of NM1, separate from the meeting to review plant performance at Nine Mile Point.

Sincerely,



Tim Judson
Syracuse Peace Council
Syracuse Anti-Nuclear Effort

cc: Dr. William Travers, NRC
Hubert Miller, NRC Region 1
Deborah Katz, Citizens Awareness Network
Kyle Rabin, Environmental Advocates
Howard Hawkins, Greens of Greater Syracuse
Paul Gunter, Nuclear Information & Resource Service
Heidi Siegfried, Oswego Valley Peace & Justice
Martha Loew, Sierra Club—Iroquois Group
David Radley, Student Environmental Action Coalition
Wendy Harris, Syracuse Anti-Nuclear Effort
Simon Morrin, Syracuse Anti-Nuclear Effort
Dr. Steven Penn, Dept. of Physics, Syracuse University

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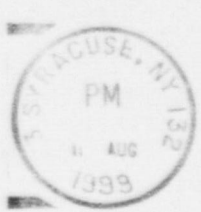

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