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RULES AND DIRECTIVES
BRANCH
USNRC

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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January 25, 2006

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**RE: Entergy VT Yankee license amendment, page 1774 Federal Register / Vol. 71, No. 7
Wednesday, January 11, 2006**

Dear Sirs:

Risk assessments in the draft ENVY Safety Evaluation released by the NRC are based on the fallacious assumption that the reactor is brand new. The plant is NOT brand new, so PRA models based on as-designed safety margins should not apply. I think it very likely that the reduced safety margins documented on nearly every page of the draft SE, based on faulty PRA models, cumulatively add up to a SIGNIFICANT REDUCTION IN SAFETY MARGINS.

The SE reports "significant uncertainty exists regarding the licensee's method for calculating stress on the (cracked) steam dryer" so NRC plans an experimental power ascension test. Testing questionable components while the reactor is on-line by definition throws caution (and any safety margins) to the wind. In a November 9, 2005 letter to NRC Chairman Nils Diaz, Congressman John Olver calls it "IRRESPONSIBLE" and says it "creates an unacceptable risk to the lives of all who live in the vicinity." Congressman Olver is a scientist, a Ph.D in Chemistry, a cautious man, and would not say such things without careful consideration of all the facts.

In testimony to the Advisory Committee on Reactor Safeguards, VT's Nuclear Engineer William Sherman pointed out that containment overpressure could be defeated by just one .5-inch valve left in the wrong position. He cited a recent event at VY revealing a .75-inch containment system valve left in the wrong position for 9 years. Allowing containment overpressure without doing an exhaustive inspection of the entire containment system represents a significant reduction of safety margins and of "defense in depth." An ISA is needed to ensure containment integrity, not just probabilities on paper. This is true of all plant systems: paper guarantees nothing.

NRC seriously jeopardizes the public trust by it's relaxation of ENVY's surveillance and reporting requirements and its reduction of safety margins while simultaneously advocating for a frightening 20% uprate.

An Independent Safety Assessment as performed at Maine Yankee would go far in restoring public confidence in your ability to regulate the industry and protect public health and safety.

Thank you for the opportunity to comment.

Sally Shaw, in the EPZ
Gill, MA

Sally Shaw

E-RIDS = ADM-03

SISF Review Complete

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