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U.S. Nuclear Regulatory Commission
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In reverence to: Federal Register / Vol. 71, No. 7 / Wednesday, January 11, 2006, page 1774

I am extremely concerned over the VT Yankee uprate. The safety evaluation is not acceptable to myself, members of my family, and many friends and neighbors are outraged. The risk assessments in the draft Safety Evaluation released by the NRC are based on the assumption that the reactor is brand new. The plant is NOT brand new, so the design basis safety margins NO LONGER APPLY. The vast number of reduced safety margins on every page of the SE add up to a SIGNIFICANT REDUCTION IN SAFETY MARGINS. hat safety margins should apply to an aged, embrittled, cracked plant, because they refuse to do an ISA to actually inspect the degree to which components are leaking, degraded, cracked or left in the wrong position. This is irresponsible.

NRC says: "significant uncertainty exists regarding the licensee's method for calculating stress on the (cracked) steam dryer" so it plans an EXPERIMENTAL POWER ASCENSION TEST. Experimenting with stressing out plant systems while the reactor is on-line is by definition a reduced safety margin. John Oliver calls it "IRRESPONSIBLE" and "RISKING THE LIVES OF ALL WHO LIVE IN THE VICINTY." He is a scientist, a PhD in Chemistry, a cautious man, and does not say such things lightly.

The fatal flaw and limitation of probabilistic risk assessment is that it does not consider consequences

The Union of Concerned Scientists concluded that the risk assessments are seriously flawed and their results are being used inappropriately to increase -- not reduce -- the threat to the American public.

I ask you to take back this safety evaluation and not agree to the uprate of VT Yankee.

Respectfully,


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E-RIDS = ADH-03

SISF Review Complete

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