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Guilford, VT 05301

February 6, 2006

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

RULES AND DIRECTIVES
BRANCH
USNRC

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Re: page 1774 Federal Register/Vol.71, No.7/Wednesday January 11,2006

Dear Sir:

The probabilistic risk assessment used by the licensee assumes the plant to be new.

It is, however, 33 years old. Without a complete Independent Safety Assessment, it is impossible to know which components are cracked, leaking, degraded or even mispositioned, and therefore to determine the real safety margins.

It is impossible for the NRC staff to assure the public that there is no significant increase the probability of an accident.

Recent events involving the high pressure coolant injection system, a mispositioned valve in the containment, the many problems discovered in the superficial inspection already performed, and the transformer fire of 2004, are all evidence that a thorough safety assessment must be performed before an uprate is granted approval.

Sincerely,

Sarah Kotkov

Sarah Kotkov

SESP Review Complete

Template = ADM-03

E-RDS = ADM-03
Case = C. R. R. (C.R.)
R. E. R. (R.E.)