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

1/11/06
71 FR 1774
(59)

To Whom it May Concern:

As a very concerned citizen and resident of Western Massachusetts which is in the near vicinity of the Vermont Yankee Nuclear Reactor, I am writing in response to the the VERMONT YANKEE: NRC open comment period

The publication date and page number of this Federal Register notice is:
page 1774 Federal Register / Vol. 71, No. 7 / Wednesday, January 11, 2006 .

You the NRC have said that: "significant uncertainty exists regarding the licensee's method for calculating stress on the (cracked) steam dryer" so you are planning 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 Olver our Congressman 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 defeat of containment overpressure by valves that might be in the wrong position (as recently revealed to be the case by the VT state nuclear engineer in testimony to the Advisory Committee on Reactor Safeguards) means that allowing credit for containment overpressure, even for 15 minutes, represents a significant reduction of a safety margin and of "defense in depth." An Independent Study Assessment is needed to ensure containment integrity. Repeated events involving inoperability of the high pressure coolant injection system (HPCI system) call into question defense in depth. **An ISA is needed to understand why this is happening and what else might go wrong in other back-up cooling systems.**

The Union of Concerned Scientists (UCS) examined how nuclear plant risk assessments are performed and how their results are used. They 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. Scientist Dr Gordon Thompson told us that a serious accident at Vermont Yankee would make Three Mile Island and Chernobyl look miniscule in comparison, due to all the stored nuclear waste rods being improperly stored on the property in a building next to the reactor. Please seriously consider **this extremely serious risk** to the American people and the environment before any action is taken.

Sincerely
Imre Kepes

11 Arnold Road
Pelham, MA 01002

6238 Review Complete

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