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From: <sunny@traprockpeace.org>
To: <vermontyankeeeis@nrc.gov>
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Subject: Scope of environmental assessment

Proper Scope of
Environmental Assessment
Predicting Impacts of
End-Stage Operation of the Vernon Reactor

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RULES AND DIRECTIVES
DIVISION

Sunny Miller, Executive
Director
Traprock Peace Center

103A Keets Road

Deerfield, MA 01342

413 773-7427

Background

Traprock Peace Center was founded in Deerfield, Massachusetts 1979 to promote nonviolent resolution of local, national and international conflicts, to work for economic justice and disarmament.

Traprock Peace Center staff, volunteers and supporters join with elders and consultants nationwide cautioning against excessive risks associated with continuing operations at our oldest nuclear reactors.

In the early 1990's we took a close look at embrittlement at the nation's oldest reactor in Rowe, Massachusetts when they proposed 20 additional years beyond their 40 year license. Thanks to the scrutiny of nuclear engineer Bob Pollard, Pollard left the Nuclear Regulatory Commission after many years of service, distressed because the NRC would not enforce their own regulations. Using only NRC documentation, he showed that the chances of having a melt-down were unacceptably high — we had a greater chance of having a melt-down than winning the Mass Millions lottery. And we didn't have to buy a ticket to play. Regular users of nuclear electricity, and neighbors off the grid had a chance.

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When public scrutiny helped the NRC and Yankee Rowe operators consider the full details, economic realities helped the operators decide to close that facility. Managers, staff and regulators stayed to work on years of clean-up, retired, or moved on to work at other reactors. No blot of a melt-down smears their resumes, and no suicides that I know of reflected remorse over their decision.

Inadequate Inspections and Oversight at the Vernon reactor

Only after owners and managers of the Vernon reactor asked for the remarkable 20% increase in output, 20 excess years of operations and permission to store radioactive waste in the cheapest containers legally available, did we begin to turn our attentions to the problems at the Vernon reactor.

Proper assessment will take into account that:

For twenty-two years four pumps did not have adequate capacity to pump coolant. We needed this reliability. Neighbors to this nuke, and every other in the country, had perpetual assurances of quality control but no reliable control mechanism. I accepted long ago that people make mistakes. Does your job require that you engage in the fantasy that people won't make mistakes? On August 23, 1996, regulators said a VY violation (of theoretical requirements) involved the failure to include an analysis of the most damaging single failure vulnerability for certain loss of coolant accidents. This condition existed for 22 years without being identified during any of the Cycle analyses, even though a number of reactor and industry operating events and activities related to the RHR system had been reviewed and evaluated by Vermont Yankee staff, again and again during this twenty-two year period. This is just one example that thoroughly illustrates that REALITIES of operations bear only limited resemblance to the theoretical management of reactors. Our proper scope of environmental assessment will fully accept the many ways human beings make mistakes. Proper assessment will review the history of errors, enumerate them and calculate the predictable continuation of human error. The history of mishaps and failures, exposed in public record is only shameful if we do not respond honorably and respectfully to its reality.

In July of 1975, did faulty valves discharge radioactive water into the Connecticut River and Atlantic fisheries? In 1995 did faulty fuel assemblies interfere with valve closing? An adequate scope of environmental assessment will require an extensive period for assessing contamination levels in air, water,

soil, plant, animal tissues. Adequate scope will establish radiation monitoring in a 100-mile radius of the Vernon reactor in Massachusetts, New Hampshire and Vermont, on an ongoing basis for the remainder of the license period.

The assessment team will have no fear of retribution for a report that constrains reactor operations.

The assessment team will compare the environmental impact of wind, solar, hydro and geo-thermal alternatives as if they enjoyed the full insurance and financial benefits enjoyed by nuclear energy utilities, and report those comparisons year by year for operations for 10,000 generations-- or for the length of time future generations will need to manage our waste without benefit.

Assessors will compare cultural willingness to isolate materials no longer in use, when those materials pose a health risk, whether is no longer interest in those materials, or whether substantial bribes are available to sell nuclear remains illegally, in both prosperous and desperate times.

An adequate assessment team will include sociologists who can assess the human factors relevant for environmental protection for the length of time needed for isolating wastes produced in a twenty year period, not the environmental protection needed in a twenty year period.

Corruption in the age of
Enron

Futhermore, adequate assessment will accept that excess profits entice excess corruption.

The assessment team will not fear a conclusion that advocates for replacement of nuclear technologies with sustainable and renewable technologies that pose far fewer health and safety risks, and can reduce the economic hardship of storing radioactive wastes, for generations to come. We believe that a thorough safety assessment will uncover numerous problems at New England's oldest operating nuclear reactor.

An effective assessment team will urge all

local, state and federal officials to insist that a thorough, independent safety assessment must be done.

As we have learned from Rosa Parks and Rev. Dr. Martin Luther King, Jr., thorough discourse and thoughtful, persistent nonviolent action are often needed to attain justice -- and some great songs might help us sustain our community, our commitment and our common understanding until we do.

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CC: <charles@traprockpeace.org>

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Creation Date Fri, Jun 23, 2006 11:56 PM
From: <sunny@traprockpeace.org>

Created By: sunny@traprockpeace.org

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traprockpeace.org
charles CC

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