

June 20, 2006

Mr. Joseph M. Sebrosky
Mail Code 13 D13
Senior Project Manager
Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

Subject: OPPD's Request for Exemption from Technical
Specifications (L23984)

Dear Mr. Sebrosky:

I would like to submit my opposition to the exemption submitted by the Omaha Public Power District to use a transfer cask that is purposely designed to give high dose to the workers. As a long time worker at a nuclear plant, I believe I have an obligation to speak for my peers who actually do the work.

First, I believe that there is no valid basis for Omaha to file this exemption and an equally illogical basis for the NRC to consider it. The exemption process is intended to address a safety issue, not an economic issue. This exemption request is motivated by purely economic considerations on the part of OPPD. If the exemption is not granted, then the District will operate without a full-core reserve. I know from my long career in this industry that some plants have in the past chosen to operate without full-core reserve in the pools. Operating without a full-core reserve is not a safety matter or a regulatory requirement.

Second, the exemption requests waiver from the dose rate measurements during loading that were put by you, the NRC, to protect worker health and safety. This waiver would amount to a license to shower the workers with extra dose beyond what you have specified in the Technical Specification. Why? For what reason would you allow more dose than what you have previously considered prudent? In addition to the dose waiver, the exemption also requests the setting aside of many other Technical Specification provisions. I am not technically qualified to understand their safety significance, so I cannot comment on them. But I figure they must be essential for safety because NRC mandated them in the first place. If they are important, then why waive them so a plant is not inconvenienced?

By granting waivers of this type, you will look like a mere puppet, not a regulator, of the industry. I am also worried that such a drastic violation of the NRC-issued Certificate was occurring and no one challenged it until three days before loading was to begin. Credit goes to your resident inspector, John Hanna, who by stopping the loading, saved your reputation. But what if you had less a qualified or less courageous resident inspectors there?

By granting this exemption, you will reinforce the concern of those citizens who believe that NRC is little more than an obliging puppet of the nuclear industry.

I have written to the NRC before on the NUHOMS cask [REDACTED] which, in my opinion, is a poor and unsafe storage cask. Now the people of Omaha will be saddled to load NUHOMS with a transfer cask that will give off oodles of dose to anyone who gets near it. OPPD's workers will also be guinea pigs for a loading process using a container housing on the refueling floor that has never been done before. I thought that under the no-significant hazards evaluation required at every plant, the loading step where the transfer cask is moved inside the shielding container would raise safety issues such as, what if the cask hits and tips the container over? A new potential accident - you bet.

I am sharing this note of protest with the officials in Nebraska who are tasked with the job to look after the local people; I hope they are not napping.

Very truly yours,

[REDACTED]

[REDACTED]