C-10 Envisions A Clean, Safe, Sustainable,
Non-nuclear Energy Future

July 13, 2006

Samuel J. Collins
Regional Administrator, Region 1
Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pa. 19406

Dear Mr. Collins;

The C-10 Foundation is contracted with the Massachusetts Emergency Management Agency (MEMA) to conduct the independent real-time off-site monitoring of airborne emissions from the Seabrook nuclear power plant. Recently, we learned that Seabrook had an on-site tritium leak in 1999. To our knowledge, while the leak was monitored, adequate repair to the leak within the spent fuel pool canal was not done until 2004. We understand that the licensee as a "courtesy" has established 17 shallow and a few deep wells on-site at Seabrook since 2004. The NRC refers to what you coin as a "voluntary initiative" by the industry to monitor for a radionuclide water plume as a public "courtesy".

This "courtesy" appears to be in lieu of the NRC's "voluntary initiative" to regulate. The NRC does not have regulations requiring on-site data collection or any requirement that hydro-geological surveys be done to establish an on-site monitoring protocol to identify radiological leaks and spills before they reach public off-site groundwater supplies.

Your agency has identified numerous nuclear power plants that have had unidentified leakage from their facility's systems and structures that hold or transfer radioactive fluids. These are unmonitored and unplanned

radioactive leaks. It is intolerable that the NRC does not have clear regulations concerning the identification and mitigation these leaks. It is unconscionable that these leaks have been allowed to continue until evidence of off-site radioactive contamination of public groundwater exists without any serious attempt by the NRC to regulate these leaks. NRC negligence has resulted in contamination of groundwater supplies, contaminating public drinking water with radioactive materials.

Please find enclosed a list of questions concerning this issue. Please provide us with a written response to the enclosed questions in a timely fashion. We request all documentation and data concerning the unmonitored and unplanned tritium and radioactive leaks from Seabrook from 1999 – 2006.

Thank you for your attention to this serious issue.

Sincerely,

Sandra Gavutis

Sandra Gavutis
Executive Director For
The Board of Directors
C-10 Foundation
44 Merrimac St.
Newburyport, Ma. 01950

cc; Congressman John F. Tierney
Congressman Edward J Markey
James Milkey, Chief of Environmental Protection,
MA. Office of the Attorney General

Questions Requiring NRC Written Response Concerning:

The Tritium Leak Identified in 1999 at the Seabrook nuclear generating station, Seabrook, NH

Describe the leak:

When did the spill or leak(s) occur? Specifically, when did the leak occur in 1999?
What was the source of the leak describing the specific system or structure?
We understand that the leak was in the stainless steel canal between containment and the spent fuel pool. Is it normally empty and only filled with water for refueling?
Has a root cause of the leak been determined? Is it a public document?
What caused the leak reportedly fixed in 2004? Stainless steel is fairly resistant to corrosion, leading one to believe that its not the piping that was leaking but rather the welds holding the pipes together that leaked. Exactly where was the leak or leaks within the canal?
If this stainless steel canal could leak, what about other piping carrying radioactive liquid from the plant to the Atlantic Ocean. Could a leak in that piping be detected?
Was the source of the spill or leak repaired or replaced?
What specific radionuclides could be in the water within the canal?
What specific radionuclides were involved in the leak?
What tests were employed to determine the spill or leak constituents?
What was the concentration of each radioactive isotope in the groundwater?
What was the estimated volume of the spill or leak?
Has the licensee conducted a hydro-geological assessment of the site as regards further movement of the leak or spill? Is it available for public review?
Where specifically are the wells on-site? Identify them on a map and the depth of each of the seventeen wells.

Describe notification efforts made by the licensee:

Was the spill or leakage documented in accordance with 10 CFR 50.75(g) requirements?
When was notification made by licensee?
Who was notified of the spill or leak? NRC? State? Local? Who by name and title.
Was the spill or leak reported in the licensee's Annual Radiological Effluent Release Report as an abnormal or inadvertent release of radioactive material?

Describe the level of radioactive monitoring conducting by licensee:

How was the spill or leak initially detected? (Test wells, etc.)
To what extent has the radioactive spill or leak contaminated onsite groundwater?
To what extent has the radioactive spill or leak contaminated offsite water?
What methods are being used for monitoring current and future groundwater migration?
When did ground water monitoring for migration of the spill or leak begin?
Is there further ground water monitoring of the spill or leak planned?
How has the spill or leak modified ground water monitoring of the site?

Describe any past, current and future remediation efforts of radioactive contamination conducted by the licensee:

Did the operators of Seabrook have a remediation plan in place at the time of the spill?
When did site remediation action begin?
What specific remediation efforts were used?
Is remediation completed or is further remediation planned before or during decommissioning?