



Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

June 7, 2012

William Dean, Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
2100 Renaissance Boulevard
Renaissance Park
King of Prussia, PA 19406

Subject: Emergency Response Capability at Pilgrim During Labor Issue

Dear Mr. Dean:

According to recent news reports, the owner of the Pilgrim nuclear plant locked out a sizeable portion of the nearly 560 person work force during an ongoing dispute over a labor contract. The NRC was reported as having its inspectors at the site to review contingency staffing measures.

I realize this is not the first time the NRC has dealt with labor issues at nuclear plants. From my reviews of NRC documents associated with past instances, the NRC's inspectors examine the training records and qualifications of individuals covering for striking and/or locked out workers as well as monitoring the effectiveness of tasks performed by these individuals.

What I have not seen in these documents is if the NRC determines whether all the required positions needed to be staffed in response to a nuclear plant emergency can be filled by individuals with appropriate training and qualifications for these vital duties. As you know, the emergency response plans involve operators, engineers, radiation protection technicians, communications specialists, maintenance workers, and many other individuals.

With so many employees barred from entering the Pilgrim plant, does the NRC truly ensure that properly trained and qualified individuals would perform these emergency response duties? Or does the NRC have its collective fingers crossed hoping that nothing bad happens until the labor dispute is resolved and trained workers once again ready to protect the public in event of an emergency?

Sincerely,

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