

BUSINESSMEN FOR THE PUBLIC INTEREST

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June 3, 1971

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Dr. Glenn Seaborg, Chairman
U.S. Atomic Energy Commission
Washington, D.C. 20545

Dear Dr. Seaborg:

We have reviewed the Idaho Nuclear Safety Reports on Tests 845-850 of the Semiscale Blowdown and ECC Project, and have compared them with the Water Reactor Safety Program Plan and other AEC documents.

Warnings that ECC water might bypass the core and be blown out the primary system break appear explicitly at page 90 of the Ergen report, page 49 of NSIC-24, and pages 2, 19 and 20 of IN-1384. Moreover, the Leidenfrost effect is a well-known phenomenon in two-phase flow theory.

In view of the fact that the tests verified the accuracy of these test objectives, we feel that the Commission is wrong in regarding the test results as "surprising" or "unexpected."

We are particularly disturbed by an AEC press release, dated May 28, 1971, which attempts to denigrate the tests by saying:

The recent small mock-up tests at NRTS were not designed to represent the response of an actual operating nuclear power plant to a loss of coolant accident. There were significant differences in the experimental system which was tested as compared to an operating reactor.

In view of the fact that the blowdown test data from that same facility has been used to support license applications, we do not see how the Commission can have its cake and eat it too. Either the facility does "closely model commercial plant

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Dr. Glenn Seaborg

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ECC systems" (page 27 of IN-1384), in which case the ECC systems on commercial PWR's do not work, or the test results on blowdown used in previous license applications must be cast out and the matter remanded for de novo consideration, which would entail holding new hearings on those license applications.

In view of the crucial nature of this problem, we believe the only prudent course for the Commission to follow, in addition to its expressed intention to hold up licensing new plants, would be to suspend the licenses, until the ECC system has been experimentally verified, of the reactors named on the attached list.

We ask the Commission to suspend these licenses on the grounds that the assurance of no undue risk to the public health and safety demands that no other course be followed by the Commission.

Sincerely,

David Winchell Comey

DLG:mk
enclosure

OPERATING LICENSES TO BE SUSPENDED

<u>Name of Plant</u>	<u>Location</u>	<u>Operator</u>
Connecticut Yankee	Haddam Neck, CT	Connecticut Yankee Atomic Power Co.
Dresden 2, 3	Grundy County, IL	Commonwealth Edison Co.
Ginna	Ontario, NY	Rochester Gas and Electric Co.
Monticello	Monticello, MN	Northern States Power Co.
Millstone 1	Millstone Point, CT	Connecticut Light and Power Co.
Nine Mile Point	Oswego, NY	Niagara Mohawk Power Co.
Oyster Creek	Oyster Creek, NJ	Jersey Central Power and Light Co.
Point Beach 1	Two Creeks, WI	Wisconsin Electric Power Co.
Robinson 2	Hartsville, SC	Carolina Power and Light Co.
San Onofre	Camp Pendleton, CA	Southern California Edison Co.

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Dear Mr. Comey:

This is in response to your letter of June 3, 1971, concerning licensed nuclear power plants and emergency core cooling. The Commission, of course, is well aware of the information referred to in your letter and it was part of all of the information considered in the conclusion expressed in the Commission's press release of May 27, 1971, in consideration of emergency core cooling systems for nuclear power plants that "this is not the type of problem requiring the shutdown of operating plants".

As you know, the Regulatory Staff's Task Force of senior technical people is reevaluating emergency core cooling system designs. Should the Commission find that changes in design or operation of licensed plants are necessary such changes will be included as part of the regulatory process.

We will be pleased to inform you of the outcome of the Commission's reevaluation of emergency core cooling systems when this information becomes available.

Cordially,

(Signed) Glenn L. Seaborg

Chairman

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