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UNITED STATES OF AMERICA
BEFORE THE NUCLEAR REGULATORY COMMISSION

In the Matter of)
POINT BEACH NUCLEAR PLANT, UNIT 1)
Petition of Wisconsin's Environmental)
Decade, Inc.)



UNION OF CONCERNED SCIENTISTS
STATEMENT IN SUPPORT OF PETITION

The Union of Concerned Scientists supports the petition filed by Wisconsin's Environmental Decade to prevent start-up of Point Beach Unit 1 because the degradation of steam generator tubes poses a present threat to public health and safety. In addition, UCS urges the Commission to review the bases for permitting continued operation of all other pressurized water reactors which have experienced steam generator tube degradation and/or which have been granted operating licenses pending resolution of the generic study of this unresolved safety problem on the ground that increased inspection and maintenance programs would detect degraded tubes.

The Commission must keep in mind that there are two separate issues raised by the petition. The first question has to do with compliance with the Point Beach technical specification limiting the percentage of steam generator tubes that can be plugged without restriction on plant operation. This limitation is required so as to ensure that the Commission's ECCS criteria are met. The second issue - and UCS believes the more important one - is the justification for the assumption that all unplugged steam generator tubes would maintain their integrity in the event of a LOCA. This problem is more serious because the rupture of a small number of steam

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generator tubes during a LOCA would add heat and steam to the primary system which would exceed the ECCS design bases. Paragraph 23 of the petition quotes extensively from the American Physical Society report on this subject, which concludes that rupture of one to ten tubes could "induce essentially uncoolable conditions in the course of a LOCA."

The safety problems associated with steam generator tube degradation constitute one of the generic unresolved safety problems and have been known to the Commission for years. The petition deals in detail with the various rationales that have been constructed by the staff for permitting plants to go into operation and to continue in operation despite the fact that the problem remains unresolved. The basic staff argument has been that an "early warning system" of increased inspection would discover degraded tubes so that they could be plugged or other corrective action taken. The petition clearly establishes that this system cannot be relied upon; it failed to detect tube corrosion of up to 50% of the tube wall thickness. In the face of this evidence, operation of Point Beach based upon reliance on inspection and maintenance cannot be justified.

The problem does not stop at Point Beach. The same rationale has been cited by the staff as a basis for permitting continued operation of other plants experiencing tube degradation and has also been provided to Atomic Safety and Licensing Boards as a basis for the issuance of construction permits and operating licenses. UCS believes that petitioners' request for a hearing on steam generator tube degradation prior to restart of the Point Beach nuclear plant

should be granted. The Commission should also decide whether to modify, suspend, or revoke the operating licenses and construction permits of other pressurized water reactors to compensate for the absence of a valid resolution to the generic safety problem of steam generator tube degradation.

Submitted by the Union of Concerned
Scientists

By


Robert D. Pollard


Ellyn R. Weiss

DATED: November 28, 1979

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the "Union of Concerned Scientists Statement in Support of Petition" were hand-delivered this 28th day of November, 1979 to the following parties:

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U.S. Nuclear Regulatory Commission
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Victor Gilinsky, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Richard Kennedy, Commissioner
U.S. Nuclear Regulatory Commission
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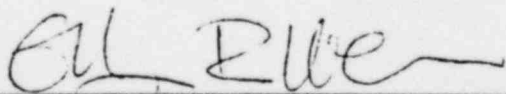
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