

Daniel V. Edson
11 Salem Street, Newburyport, Massachusetts 01950
978-417-1476 — dandeson@gmail.com

October 2, 2019

Administrative Judge Ronald M. Spritzer
Atomic Safety and Licensing Board
c/o Molly Mattison
Mail Stop T3A27
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Chairman Spritzer,

Having sat through hours of comment and testimony at the Atomic Safety and Licensing Board (ASLB) evidentiary hearing in Newburyport, Massachusetts, the week of September 23, 2019, I feel that the ASLB has no option but to rule in favor of the contention by the C-10 Research and Education Foundation (C-10), both because the NextEra Seabrook concrete testing program *"yielded data that are not representative of the [alkali-silica] reaction's progression at Seabrook"* and because *"the resulting monitoring, acceptance criteria, and inspection intervals are inadequate."*

Testimony from C-10 and NextEra, and comments from Nuclear Regulatory Commission (NRC) staff, clearly revealed that much additional – and more meaningful – data could have been obtained for a number of reasons, including:

- Material used in NextEra's testing was not representative of material used in Seabrook construction.
- Environmental conditions at the Texas test facility could not have been even close to the environmental conditions on the coast of New Hampshire.
- Additional – and different – tests would have provided significantly more data, notably data that would indicate how the alkali-silica reaction (ASR) might progress.
- Concrete/structural consultants directly involved with testing lacked deep, credentialed ASR expertise.
- Test results were not peer reviewed (a stunning lapse of scientific rigor).

Ruling in C-10's favor is not tantamount to an admonishment of NextEra or the NRC; ruling in C-10's favor simply acknowledges what is obvious, that the Seabrook ASR testing to date is insufficient. (Certainly, NextEra and the NRC undertook the Texas testing with good intentions and did obtain some valid and pertinent test results.)

With ten years remaining on NextEra Seabrook's current license, I see no justification for hurrying the process of determining the severity of ASR at Seabrook Station and – if appropriate – for devising a monitoring program.

Respectfully submitted,



From: [Dan Edson](#)
To: [Mattison, Molly](#)
Subject: [External_Sender] Comments for ASLB 9/23-27/2019 Evidentiary Hearing
Date: Wednesday, October 02, 2019 11:55:42 AM
Attachments: [NRC ASLB Spritzer 2019-10-02 - C-10 NextEra hearing comments.pdf](#)

Dear Molly,

I understand the Atomic Safety and Licensing Board is still taking comments related to the C-10 Research and Education Foundation's challenge to NextEra Seabrook's concrete testing program. Please accept the attached comments.

Best regards,

Dan Edson

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Dan Edson | 978 417-1476