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Darryl Eisenhut,
US NRC

Dear Darryl,

Phyllis Eitzen was kind enough to allow me to use her recording of the Pottstown Preliminary Risk Analysis himerick hearing. The presentation raised more questions in my mind than it answered.

You state very early that some very preliminary calculations show that himerick would not be acceptable today.

I would like to see those "preliminary calculations."

Where or what report are they in? Is this what Harold Denton referred to in a Congressional Hearing on himerick at Bucks Co. Community College. Denton said that himerick would not be approved today.

Was the preliminary risk analysis given at the Pottstown meeting, probabilistic risk analysis and PRA all the same thing? What were the ground rules given to himerick by NRC for this PRA of himerick? What NUREG defines PRA? Please send me copy.

The PECO presentation seemed to ~~compare~~ compare the himerick plant with the Rasmussen study. Is this what PRA means? "compare a site with the site in WASH 1400"

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"Nature can cause larger accidents than man."
What does this PECO statement have to do with
the limerick PRA? You could also say that
one of out of one will eventually die; therefore,
it doesn't matter if a person dies of old age
or a limerick disaster.

IT MATTERS TO ME!

PECO uses WASH 1400 emissions and consequences.
They only changed the weather and population. PECO
did not ~~factor in~~ ^{factor in} the Harold Lewis report. PECO
did not factor in the Lewis or Rasmussen "date spread".
Lewis stated that the error bands of WASH 1400
are too small. Nonetheless, the PECO handout at the
Pott-~~tan~~ meeting did not show any error bands.
Further the experience at TMI #2 was not even
mentioned. The accident at TMI #2 did happen.
The accident at TMI #2 shows that we must ~~explain~~
expect a TMI type accident once in every 800 years.
(Reactor Safety "Walter H. JORDAN 1980") This same scenario
had a predicted probability of 1 in several hundred thousand
or 1 in several million.

Therefore WASH 1200 is not conservative! Such Lewis
stated that WASH 1400 is conservative. Therefore the
PECO PRA is already is doubt as not conservative.

I cannot go over all the past criticisms that I have sent to the NRC on the Limerick plant. However, I shall reiterate one previous criticism of Limerick that still goes unanswered.

Limerick sits next to a quarry. Blasting goes on at that quarry. The blasting goes on at that quarry while concrete is poured and curing at Limerick. Shaking uncured concrete will affect the strength of the cured concrete. Phyllis Zitzer, Frank Romano and I have pointed out this concrete problem at Limerick.

Mr Tibbets ~~of~~ of the NRC had a meeting on the concrete questions. He merely asked if the blasting exceeded the Safe Shutdown Earthquake of 10 CFR 100. The SSE refers only to the cured concrete in an operating reactor. The SSE does not refer to the shaking of uncured concrete.

Considering the recent worries due to the hydrogen spike at TMI #2, the NRC must be sensitive ~~to~~ ^{the} any possible lessening of the containment ~~stress~~ strength.

Will you make the PECO incorporate the possible lowered concrete strength in its Probabilistic Risk Analysis of Limerick?

Marvin Lewis.