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Wisconsin's  
Environmental  
Decade



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July 4, 1981

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Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20036

Re: Point Beach Nuclear Plant Unit 1  
Docket 50-266

Dear Mr. Denton:

Reference is made to the letter from Wisconsin Electric Company, dated July 1, 1981, in the above referenced proceeding, relating to steam generator tube degradation, and signed by Mr. C. W. Fay.

Mr. Fay indicates that the utility may increase the primary hot leg temperature from 557° F to 575° F if the steam generator inspection during the July 4, 1981 outage shows no significant change in the condition of the steam generators and if the crevice flushing continues to show low levels of caustic materials.

This proposal is supported by the statement that: "We believe that the combination of sludge lancing and crevice flushing has been effective in removing some caustic materials from the steam generators and thereby reduced the rate of progression of tube degradation." [Emphasis added.]

It is the position of Wisconsin's Environmental Decade that such a proposal is not supported by the facts and should be prohibited by the Commission on the following grounds.

First, the letter sets forth no facts or analytical results to support what they "believe", and second, they do not even pretend to assert that more than "some" of the corrodents have been removed. A review of the history of the tube degradation problem demonstrates that neither the vendor nor utility fully understand the corrosive processes at work and that they are unable to anticipate the future course of the problem. The most recent unsupported proposal is just one more instance of the "trial and error" approach they have adopted in the face of their

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general ignorance.

Insofar as anyone can demonstrate at this point in time, today's apparent subsidence in corrosion at Point Beach may equally well be due to the present temperature reduction or to pure chance. Thus, there is an equal probability that increasing the hot leg temperature will cause runaway tube degradation to reoccur as not.

It would appear likely that the utility's new decision to restore power before performing any repairs is actually motivated by the fact that the San Onofre sleeving experience has been so disappointing in terms of cost and effectiveness. Faced with the prospect of reduced output costing approximately \$20 million a year until new generators are fabricated, Wisconsin Electric has apparently chosen to err on the side of dollars instead of lives.

We have here an issue of such portentous consequences that a penny pinching trial and error approach that could accelerate tube degradation should be out of the question, especially when there simply is no overriding need to take such a gamble. Studies by the independent American Physical Society, as well as one in-house Atomic Energy Commission study and one peer review study commissioned by the Nuclear Regulatory Commission have concluded that degraded steam generator tubes could cause the emergency core cooling system in a nuclear reactor to fail during a loss of coolant accident.

Under circumstances such as these, to engage in a trial and error approach is to treat the people of Wisconsin as fitting for a giant research experiment with their lives in the balance.

We implore the Commission to bar Wisconsin Electric from engaging in such a reckless gamble for no other purpose than to increase the output of the unit by a mere 10% at a time when the state possesses enormous excess reserves.

This is not a situation where you are toying with vials, flasks and bunsen burners in a white walled laboratory high up on some mountain top. You are dealing with the lives of real people. We would hope that the Commission's callous refusal to confront fundamental generic safety issues that led to the accident Three Mile Island will not be repeated here and, for once, the specific individuals in the agency who are responsible will recognize its legal and ethical obligations to those it ostensibly serves.

Sincerely,  
WISCONSIN'S ENVIRONMENTAL DECADE, INC.

by

PETER ANDERSON  
Director of Public Affairs

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cc:Gerald Charnoff, Esq., Ellyn Weiss, Esq.