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## Wisconsin's Environmental Decade

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June 22, 1982

Mr. H. R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Re: Point Beach Nuclear Plant Unit 1  
Docket 50-266  
(Steam Generator Replacement)

Dear Mr. Denton:

Reference is made to the Licensee's letter dated May 27, 1982, stating its intention to replace the two steam generators at Point Beach Nuclear Plant Unit 1 without requesting a license amendment from the Commission under 10 C.F.R. §50.59.

This is to state our objection to the Licensee's intention and indicate our opinion that a license amendment is required for this major overhaul.

Replacement of steam generators poses unresolved safety questions in view of the fact that tubes in the new steam generators will be subject to rupture in normal operation and during a large loss-of-coolant-accident.

With respect to normal operation, the January 25, 1982 steam generator tube rupture at Ginna Nuclear Plant demonstrated that the interaction of a large tube rupture during normal operation in a facility suffering from brittle reactor vessel wall can lead to uncoolable conditions that was never contemplated in the Point Beach final safety analysis report.

With respect to LOCA conditions, the interaction of tube ruptures followed by steam binding during a large LOCA has never been evaluated in the Point Beach FSAR.

Replacement of steam generators also poses unresolved safety problems, among other things, from the standpoint of worker exposure and non-permanent disposal of the old steam generators.

For the foregoing reasons, the Licensee should be required to apply for a license amendment before proceeding with replacement of the two steam generators at Point Beach 1. This letter may not be treated as anything but an objection to the Licensee's May 27 letter of intent to not apply.

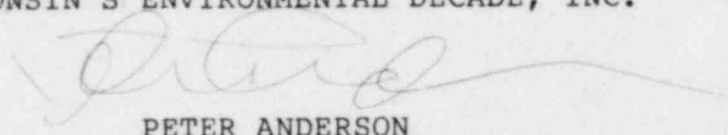
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Sincerely,  
WISCONSIN'S ENVIRONMENTAL DECADE, INC.

by



PETER ANDERSON  
Director of Public Affairs

PA/mt-P:50266NRC.L43  
cc:C. W. Fay



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