50-289 Restart

Chairman Palladino
USNRC
Washington, D.C. 20555

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Dear Chairman Palladino:

The Commission itself has been hearing Staff proposals for the Restart of TMI#1. This occurred on Dec. 5,1983. Apparently the Commission will hear these proposals directly. The Commission therefore should also hear answers to these proposals directly also. (Staff Responce dated 12-29-83.)

Please consider this letter as a "public comment" on the Staff's Proposals presented at the Dec 5, 1983,meeting.

The Staff Proposals for a Restart of TMI#1 are very limited and go only to the heart of one or two issues: management competence and cheating. The Staff Proposals do not comprehensively or definitively put these issues to rest. Also the Staff Proposals do not put to rest any other issues previous to, continuing or subsequent to the TMI#2 accident.

I am going to mention only one problem that has recently emerged andis not even mentioned on the TMI#1 restart record. This is only a representative problem of many problems that have been completely ignored in the rush to restart TMI#1. Many problems are even more immediate and even more ignored. The problems of the cleanup at TMI#2 are growing and have been completely eliminated from consideration in the Restart Docket by unreasonable and dangerous Commission Policy.

NOnetheless , the problem that I will limit this letter to has only recently surfaced (3 years ago), and is not even mentioned on the restart docket.

Fuel assemblies have degraded while in spent fuel storage pools. (Eisenhut to Vollmer 3-31-83.) The question then becomes, "How in the World can this Prairie Island incident have any relationship to the TMI#1 Restart?" There are many issues wherein this Prairie Island incident has a direct bearing on the TMI#1 Restart.

1. The atmosphere above the fuel pool communicates between TMI#1 and TMI#2. Any fuel drop or"situation (which) could result in release of fission products" (Brown to Seyfrit ,10-21-83,Page 4)in the spent fuel pool would then directly affect the safety of the TMI#1 Restart. This issue has not been explored in the Restart Hearings. In fact Commission Policy has precluded inclusion of this issue in the Restart Hearings.

2. TMI#1 is a pressurized water reactor. PWRs have recently been required by the NRC to perform fuel maneuvers to minimize neutron bombardment and subsequent embrittlement to the RPV wall as a prophylactic against pressurized thermal shock damage. These fuel maneuvers call for placing spent fuel rods in the outer row of fuel rods . These maneuvers requre the movement of fuel rods. Some of these fuel rods can be degraded causing failures and subsequent release of fission products. None of the ramifications of fuel rod maneuvers using degraded fuel rods have been investigated on the TMI#1 Restart docket nor anywhere else .

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3. The Prairie Island incident and the corrosion of the Steam Generator tubing at TMI#2 bear many striking similarities;
a. The actual cause of the failure has not been pinpointed. In the Prairie Island incident stress corrosion cracking was the cause of the failure. The contaminant or the handling that caused the stress corrosion is still unknown , but thiosulphate contaminatbn is suspect. In the TMI#1 OTSG tubing failure, stress corrosion was the cause of the failure. The contaminant or the handling that caused the stress corrosion is still unknown, but thiosulphate contamination is suspect.
b. Both at TMI#1 and at prairie Island, the stress corrosion seems to be isolated incidents that could not be observed either at other reactors or in other parts of the same reactor.
c. Both the Prairie Island incident and the TMI#1 tubing corrosion have taken years to wind their ways thru the NRC Staff's analysis and have still not been fully defined as to cause not put to sleep as to safety significance.
d. Both the TMI#1 tubing failure and the Prairie Island incident have many safetysignificant repurcussions that have not been explored especially as far as the question of pressurized thermal shock is involved. Failure of steam generator tubing can lead to a thermal shock problem at TMI#1 and failure of fuel rods could lead to many problems , not excluding a power excursion accident. A PEA could stress the RPV wall while cold water is being injected. Therefore a "fuel" failure could cause a presurized thermal shock to the RPV wall.
e. The above examples are not the only similarities that connect the Prairie Island incident and the OTSG tubing failure at TMI#1. These examples will suffice so as not to belabor the parallels.

4. The dangers of fuel storage and transshipment have been significantly increased with the knowledge afforded by the Prairie Island incident. TMI#1 has been in service for an extended period. Many of the spent fuel rods in the common pool have been stored for elose to a decade. Some were made or could have been made at a facility owned by Kerr McGee in Cimarron. The Kerr McGee facility is presently both the subject of a movie,"Silkwood," and a Court case,"Silkwood vs Kerr Mcgee." Silkwood worked on the plutonium fuel rods for the FFTF , a breeder, in Idaho Falls. In the Court trial, workers testified that similar unsafe and deficient practices went on on the other side of the Kerr McGee facility making fuel rods for LWRs such as TMI#1. Intervenor Lewis attempted to bring this up as a Contention in the TMI#1 Restart Hearings and was ruled out of order by the Board since the Board did not see a "nexus" between the TMI#2 accident and the possibility of fuel failures.
There are dangers from fuel failures during the restart of TMI#1. Whether or not these dangers will mimic or have a nexus to the TMI#2 accident is supercillious at this or anytime. In all fairness, the Commission must investigate the TMI#1 Restart from the point of view afforded by the fuel failures at Prairie Island. The similarities are too multitudinous and pointed to ignore anymore. The information is in the public domain. The issue is not new to the TMI#1 Restart Docket as it was brought up as a contention early in the proceedings and improperly dropped.

5. Further , the problems of fuel failure have direct significance in the management and cheating phases of this TMI#1 Restart Hearing. For instance, improperly kept leakage records have played a significant part leading up to the TMI#2 accidant. Similarly , improperly kept chemistry records for the spent fuel pool at Prairie Island lead to the fuel failures.
There is no telling where poorly kept records can and will lead to safety problems atTMI#1. Fuel failure and tubing failure are only two examples. The point is that faulty record keeping in the past can and does lead to future problems. Eliminating bad management at this time will not eliminate the seeds of destruction sown by bad management in the past. This State will be sitting on a powder keg waiting for the next accident if TMI#1 is ever allowed to restart.

I do not mean that this letter is definitive or comprehensive. The above discussion is a very superficial treatment that is limited both by time restaints, TMI#1 Restart decision is pending, and resource restraints, Intervenor has provided all his own monies in this intervention. Because of these restraints, Intervenor has submitted this very important issue as a "public comment." I know that the NRC and its Staff's resources are also strained. I also know that the Applicant will probably not envision that a full fair hearing of these issues will be to its own benefit even though a full fair hearing would be to the Applicant's benefit. I can only hope that the NRC will see fit to investigate these issues fairly and completely. A full , fair investigation must benefit all concerned:
1. The NRC by showing its concern and fairness.
2. The Applicant by showing that the plant is safe or how it can be made safe.
3. The public by providing for the public safety as required by the AEA.

I appreciate any time that the Commission gives to this letter and public comment.

Respectfully submitted,

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