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Samuel J. Collins, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Collins:

After attending an NRC meeting last Wednesday night on Northeast Utility problems, I would like to express my opinion to you on two matters.

The first is the proposal of Northeast Utilities to hire Sargent and Lundy (S&L) as part of their Independent Corrective Action Verification Program (ICAVP).

The second matter is the proposal of NU to hire Little Harbor Consultants (LHS) as their Independent Oversight Team for Employees Concerns (IOTEC).

1. Sargent & Lundy

S&L would not in any real sense be the truly independent verification team announced by NU and the NRC. S&L and their employees are too involved with the nuclear industry, including both the NRC and NU, to act independently or objectively. The NRC will apparently approve the appointment of S&L and then review their work and conclusions before permitting any one of the plants to restart. I question whether the NRC - known to have worked in collusion for years with NU and to have withheld vital regulatory and safety information from the public - is competent to perform these very important functions alone. It is one more example of the industry (utilities, NRC and "independent" contractors) investigating itself; a process which has helped bring about NU's many past regulatory and procedural violations.

2. Little Harbor Consultants

This team will consist of 13 members. I think the following facts concerning them are pertinent:

1. All but the two members added by N.U. at the last moment, are from the Nuclear Industry (NRC, utilities, consultants). Most have spent their entire careers in the industry. They are not only suspect as members of an "Independent" team but I question why so much nuclear expertise is needed for on a team dealing with "Employee Concerns."
2. Only three of the members have had experience with any Employees Concerns Program. This type of experience would seem more pertinent than any other.
3. 10 of the members are from "Management". Of the other three, two specialize in management consulting and only one, one of those added to the team at the last moment, has had any experience representing the interests of "Employees". For a

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team designed to resolve "Employee Concerns", I am disturbed, but not surprised that there is no participation of employees, especially of the employees who are supposedly the focus of this project; employees who have raised safety concerns.

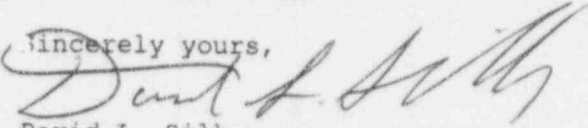
NU, with the cooperation of the NRC, is once again telling us to trust them; that they know best; that we should not worry. But we do worry and both entities have proven to us quite a few times that they don't know best and that we can't always trust them. NU and the NRC are continuing the path that got us into this nuclear mess here in Connecticut. These are not reasoned solutions for the problems they seek to address and they will not be acceptable to the public. We have heard too many solutions like these for far too long.

The Nuclear Energy Advisory Council (NEAC) which was appointed last year by the Connecticut Legislature has expressed disappointment with the process described above and has asked Dr. Jackson for a truly independent verification team. Dr. Jackson was quoted as saying that "...the current process...is sufficient to ensure an independent review." With all respect, I must disagree with Dr. Jackson. If either of these programs is to be truly independent, I think at least half of its members should be recruited from outside the nuclear industry and the NRC. There should also be a provision for participation by local people.

If any of the Millstone units restarts this year, as NU predicts, none of us can feel assured that the NRC has responsibly evaluated the safety of these plants and forced NU to meet the necessary, and not merely the expedient, safety criteria.

I hope you will take these opinions into consideration; they are shared by many of us in Southeastern Connecticut.

Sincerely yours,


David L. Silk

cc: David M. Goebel, Northeast Nuclear Energy Company
Dr. Shirley Jackson, Chairperson NRC
Connecticut Nuclear Energy Advisory Council
Citizens Regulatory Commission
Representative Sam Gejdenson
Senator Christopher J. Dodd
Senator Joseph I. Lieberman