

CITIZENS AWARENESS NETWORK

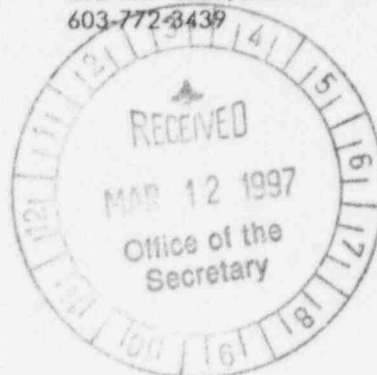
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March 11, 1997

Leonard J. Callan
Executive Director of Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001



re: Request for Licensing Actions
10 C.F.R. 2.206
Northeast Utilities
Connecticut Yankee (Docket 50-213)

Dear Mr. Callan:

Pursuant to 10 C.F.R. 2.206, this letter constitutes a petition filed on behalf of Citizens Awareness Network of Massachusetts, Connecticut and Vermont (respectively, Debby Katz, Rosemary Bassilakis, and Jonathan Block) and Nuclear Information and Resource Service (Paul Gunter, Reactor Watchdog Project) to institute a proceeding under 10 C.F.R. 2.202, to modify the license issued to NU to operate the Connecticut Yankee Nuclear Reactor by placing certain conditions, specified herein, on the operating license of this facility and taking immediate action to impose a civil penalty.

Of particular concern is NU's (CY management's) inability to maintain proper radiological controls at the Connecticut Yankee (Haddam Neck) nuclear reactor. As stated in an NRC press release:

"The most recent incident occurred on February 26, when an equipment vendor in New York State reported radioactive contamination had been detected on material released on February 19 from Haddam Neck. A survey team from Haddam Neck was dispatched to the vendor's facility and confirmed that minor levels of fixed and loose contamination, exceeding the plant's criteria for the release of radioactive material, were present on the equipment. An NRC inspector was also sent to the vendor's site to confirm the facility was not contaminated.

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Previous problems at the plant include an incident last November in which a plant maintenance supervisor and a manager for a refueling contractor received an unplanned radioactive exposure while performing activities in the fuel transfer canal. The letter also cites long-standing discrepancies in the calibration of several radiation monitors used to keep track of and control radiological effluent release to the environment. The latter problem was discovered during an NRC inspection begun on February 3, 1997."

NRC Press Release I-97-19

As you are aware, CAN and NIRS filed a 2.206 petition and amendment to that petition on November 25, 1996 and December 23, 1996. Our concerns in those Petitions were based on problems with the mismanagement of NU's Connecticut reactors. We believed that the problems at NU's reactors would result in exactly the kind of radiological contamination noted in the above NRC press release. We also believe that the confirmatory letter issued following these events is clearly insufficient under the circumstances.

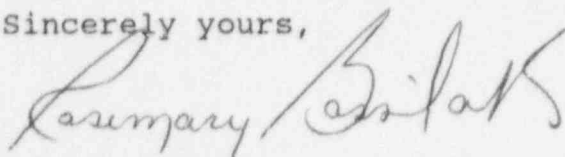
NU claimed that it was cleaning up the mess at CY last summer. In the intervening period, following the claim that they had tightened up their management controls, CY has permitted several serious contamination events. The latest involved radioactive contamination leaving the reactor site and traveling through local communities!

It is significant that these events occurred despite CY's "micromanagement" of the troubled facility AND despite NRC intervention concerning the November fuel chute contamination event (cf. the NRC Region I meeting with CY management, February 5, 1997). It is plain that NU's and CY's verbal assurances to the NRC mean NOTHING. Why should a confirmatory letter elicit any change in CY's utterly reckless behavior when hours of NRC investigations and meetings and CY and NU promises had no effect. Meanwhile, CY has become so totally reckless as to allow radioactive contamination to travel offsite all the way into New York state.

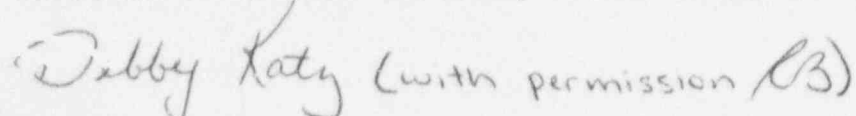
The NRC needs to take immediate additional actions to assure occupational and public health and safety connected with routine operations at CY. After all, we are talking about a facility that is in a "shut down" condition. It seems utterly inconceivable that CY and NU have allowed these kinds of incidents to continue. But even more impossible to accept is the NRC's abject failure to take any meaningful enforcement action against NU and CY.

By this letter, we ask that the NRC commence enforcement action against CY by means of a large civil penalty to assure compliance with safety based radiological control routines. We also request a modification of CY's license to prohibit any decommissioning activity, which would include dismantling or decontamination, until CY manages to conduct routine maintenance of the facility without any contamination events for at least 6 months. In order to help assure that this will be the case and to prevent a repetition of the kinds of incidents which we warned would occur, we again ask that CY be placed on the "watch list" of problem facilities. Without such actions, it is likely that occupational and public health and safety will continue to be compromised by NU's and CY's reckless mismanagement of the Connecticut Yankee reactor.

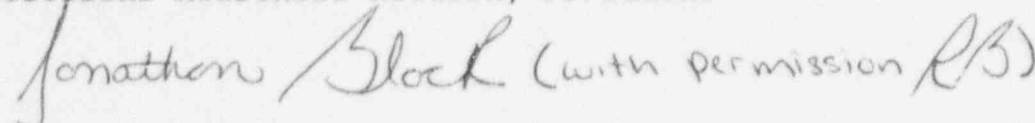
Sincerely yours,



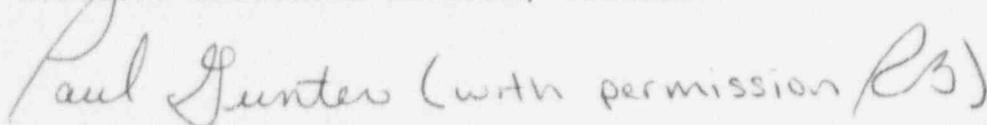
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Paul Gunter
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Director Reactor Watchdog Project