

News from Beyond Nuclear  
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Environmental coalition challenges Davis-Besse's  
'experimental' steam generator replacement  
*Groups seek NRC license amendment safety hearings*

Oak Harbor, OH—An environmental coalition has petitioned the U.S. Nuclear Regulatory Commission (NRC) Atomic Safety and Licensing Board (ASLB) for license amendment hearings to intervene against the planned steam generator replacements at FirstEnergy Nuclear Operating Company's (FENOC) Davis-Besse atomic reactor on the Lake Erie shore east of Toledo.

The coalition's intervention petition is posted at Beyond Nuclear's website, [www.beyondnuclear.org](http://www.beyondnuclear.org). So too is the coalition's expert witness testimony by Arnold Gundersen, Chief Engineer, Fairewinds Associates, Inc., as well as his Curriculum Vitae.

Gundersen has declared that the "data reviewed shows that FENOC should have applied for a license amendment with the requisite public review six years ago when Replacement Steam Generators were originally designed, ordered, and purchased."

Gundersen has delineated the significant differences between the replacement and original steam generators:

"1.) The tube inspection lane was removed; 2.) An additional tube support plate was added; 3.) 150 additional tubes were added; 4.) The tube alloy was changed; 5.) The tube-to-tube sheet junction was modified extensively; 6.) The overall design of the steam generator support structure was changed from a cylindrical skirt to a pedestal cone; 7.) The thickness of the pressure retaining walls of the ROTSG [Replacement Once Through Steam Generator] is two inches thinner than the pressure retaining wall in the Original Once Through Steam Generator; 8.) The 180-degree elbow design will be extensively modified; 9.) The alloy of the hot leg nozzles was also changed."

Gundersen has concluded that "Each and every one of these aforementioned changes is significant individually, and when taken together prove that the Replacement OTSG contains many experimental parameters, especially in comparison to the Original OTSG."

Gundersen added "the list of experimental changes identified by FENOC does not include the additional modifications applied by FENOC to cut into the Davis-Besse containment for the fourth time since it was constructed."

The coalition contends that FENOC's shortcut on safety, its circumvention of an NRC license amendment proceeding, risks repeating the same sort of dangerous mistakes made at the San Onofre nuclear power plant in southern California. In January, 2012 a steam generator tube rupture at San Onofre released radioactivity to the environment, and led to the discovery of widespread, unexpected tube degradation in replacement steam generators just a year or two old. San Onofre Units 2 and 3 remain shutdown, nearly a year and a half later.

Gundersen's testimony reported "The last three steam generator replacement projects orchestrated by licensees sought to avoid [NRC's] 10 C.F.R. § 50.59 license amendment process...By avoiding the 50.59 license amendment processes for Crystal River 3 in Florida, and San Onofre 2 and San Onofre 3 in California, the owners, Progress Energy (Crystal River) and Edison (San Onofre Units 2 and 3) caused all three units to experience total mechanical failures."

Friends of the Earth (FOE) is seeking a license amendment hearing before reactor re-start at San Onofre, due to the safety risks. A cascading failure of steam generator tubes can lead to a Loss of Coolant Accident and reactor meltdown. An NRC ASLB recently ruled in favor of granting FOE a license amendment intervention hearing. Gundersen also serves as FOE's expert witness in the San Onofre NRC proceeding.

The coalition challenging Davis-Besse's steam generator replacement includes Beyond Nuclear, Citizens Environment Alliance of Southwestern Ontario, Don't Waste Michigan, and the Sierra Club. Toledo attorney Terry J. Lodge serves as legal counsel for the coalition.

"Once again, FirstEnergy's indifference to anything but maximum profit dictates the dance," said Terry J. Lodge, legal counsel for the environmental interveners. "What if this new, experimental design doesn't work out, just as steam generator replacements in the last three reactors have proven financial disasters? For Toledo Edison it's 'first energy, safety last,'" Lodge added.

"The Sierra Club is pleased to participate in shedding light on NRC's collusion with FirstEnergy to hide from safety regulations at Davis-Besse in the name of profit and politics," said Patricia Marida, chair of the Ohio Sierra Club Nuclear Free Committee.

Don't Waste Michigan's Michael Keegan from Monroe stated "We are about to open up a whole new can of worms at Davis-Besse, this will be the death knell."

"The Japanese parliament has concluded that the root cause of the Fukushima Daiichi nuclear catastrophe was not the earthquake and tsunami, but rather the government-regulator-industry collusion that allowed the atomic reactors to be so vulnerable to a natural disaster," said Kevin Kamps of Beyond Nuclear. "Davis-Besse has been a poster child for just such NRC-FENOC collusion, from the very beginning, through the 2002 Hole-in-the-Head fiasco, and right up to the present."