



via electronic mail  
November 30, 2017

Anthony T. Gody, Jr., Director  
Division of Reactor Safety, Region II  
U.S. Nuclear Regulatory Commission

James A. Isom, Senior Reactor Operations Engineer  
Reactor Inspections Branch, DIRS, NRR  
U.S. Nuclear Regulatory Commission

### **C-10's Opposition to NRC Licensee Self-Assessments in the ROP Baseline Inspection Program**

Dear Mr. Gody and Mr. Isom,

On behalf of the C-10 Research and Education Foundation, Inc. (C-10) I am writing to express our grave concern at the proposal for the U.S. Nuclear Regulatory Commission (NRC) to surrender important regulatory oversight activities to the nuclear industry through self-assessments, as being considered under the Design Inspection Review Working Group.<sup>1</sup>

By way of introduction, the C-10 Foundation is a 501(c)(3) non-profit membership organization whose mission is to protect public health and the environment surrounding the Seabrook Station nuclear power plant in coastal New Hampshire. We are based in Newburyport, Massachusetts. C-10's core service is to operate a field monitoring network to measure real-time radiological emissions from the plant, which we do under contract with the Massachusetts Department of Public Health, Bureau of Public Health.

As our nuclear power plants age, the NRC inspection process is an essential part of monitoring the fleet and detecting problems *before* they reach a critical stage. In our work to monitor the safety of Seabrook Station, we routinely see exchanges between NRC personnel and nuclear plant employees that hold the industry accountable for meeting standards, addressing concerns, and conducting research and inspections.

Throughout nearly three decades as a citizens watchdog group, we have repeatedly witnessed an attitude of complacency by Seabrook Station owners relative to safety concerns documented by NRC resident inspectors and other personnel. It is easy to imagine that kind of attitude proliferating without frequent and thorough NRC involvement in safety inspections.

We value and endorse the points made on this subject by Dave Lochbaum, Director of the Nuclear Safety Project at the Union of Concerned Scientist in his recent letter to you, dated October 23, 2017.<sup>2</sup> Notably, Lochbaum's delineation of dozens of instances in which the NRC has detected problems that had been unflagged or minimized by corporate owners of nuclear plants, and cases where the NRC has disagreed with self-assessments of plant safety record.

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<sup>1</sup> <https://www.nrc.gov/reactors/operating/oversight/rop-design-insp-review.html>

<sup>2</sup> <https://www.nrc.gov/docs/ML1730/ML17306A152.pdf>

**Mr. Lochbaum's examples demonstrate the on-going need for careful government oversight of the U.S. nuclear power industry.**

As for-profit entities that weigh safety as only *one* performance metric among many, there is an inherent problem in expecting commercial nuclear plant owners to be unbiased and completely transparent when it comes to safety concerns that could put the public at risk — no matter how small or large they are perceived to be.

It will generally be in the plant owners' and shareholders' interests to minimize any problems that might be detected, rather than self-reporting and calling forth regulatory and public scrutiny. The possibility for reduced transparency concerns us as citizens whose lives are immediately impacted by ongoing safety problems at Seabrook Station, including and not limited to the problem known as alkali silica reaction.<sup>3</sup> Transparency and the opportunity for public input is an essential part of NRC's work, and key to C-10's ability to function as citizen watchdogs.

Because nuclear power plants are unique in their potential to cause serious harm to people and the environment, they require exceptional vigilance by independent and expert regulators. There is little margin for error, and the stakes are very high indeed. Our nation expects and depends on government oversight to create accountability in the nuclear industry. We therefore strongly oppose any alteration of NRC inspection processes which transfers responsibility to the industry to self-assess.

On behalf of the board of directors and the members of the C-10 Research and Education Foundation, thank you for the opportunity to comment on this important matter. We urge the NRC to maintain strong standards and continue its intimate involvement in the review and assessment of all safety-related issues in the nation's nuclear fleet.

If an accident at Seabrook Station or another nuclear plant were to be caused by or exacerbated due to a reduced regulatory presence, the U.S. Nuclear Regulatory Commission would bear the terrible burden of knowing that you failed to protect people and the environment, as your mission statement demands.

Sincerely,



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<sup>3</sup> On Oct. 6, 2017, C-10 was granted intervenor status by the NRC's Atomic Safety and Licensing Board in Docket No. 50-443, relative to NextEra Energy Seabrook LLC's License Amendment Request 16-03.