To: Nuclear Regulatory Commission:

Comments for the environmental review of the relicensing of Salem Unit 1, Docket No. 50-272, License No. DPR-70, and Salem Unit 2, Docket No. 50-311, License No. DPR-75.

The UNPLUG Salem Campaign is a network of organizations and individuals that acts as a public health and nuclear safety watchdog focusing on PSEG's three nuclear power plants.

This letter concerns the proposed relicensing of Salem Units 1 and 2. We oppose extending the license of these two nuclear plants. We also oppose the process by which decisions on relicensing are made. This process makes it virtually impossible for most individuals and many organizations to participate. In addition, because only certain issues are deemed acceptable by the NRC for submission as contentions, many issues of safety and health are not even looked at by NRC in making its decision.

If NRC can give Oyster Creek a 20 year extension, even though that nuclear plant could not be built under today's standards, and is a meltdown waiting to happen, it is clear that the relicensing process for Salem and Hope Creek will be nothing more than massive amounts of paperwork and an end result of PSEG being rubber stamped as "safe" for another 20 years.

However, it is important to put our concerns on the record, even though we do not expect NRC to act on any of them.

Here are some of the many areas that NRC should look at before they deny Salem Units 1 and 2 a 20 year extension:

1. Salem Units 1 and 2 slaughter billions of fish and other marine life every year because of their once-through cooling system, in violation of the Clean Water Act,
section 316(b).

(2) Salem Units 1 and 2 have leaked hydrazine into the Delaware Bay, tritium into the ground water and continue to leak low levels of radionuclides into the air.

(3) The electrical system that connects Salem Units 1 and 2 to the regional grid is old and has had a number of failures, including transformer failures.

(4) PSEG has at best a spotty record when it comes to keeping diesel generators working. This is a concern because both of the Salem plants rely on diesel generators to actually work in the case of offsite power being interrupted.

(5) PSEG has a serious Safety Conscious Work Environment (SCWE) and Safety Culture problem. This has been a chronic problem at all 3 of PSEG's plants, and continues to show up in NRC inspections under "cross-cutting issues of human performance". One key example was the tritium leak, which should have been prevented if PSEG managers and employees were doing their job.

(6) Steam Generators at Salem Units 1 and 2 have steam tubes made of alloy 600 instead of the more robust and safer alloy 660, thus forcing PSEG to have to replace steam generators more often or face the chance of a cascading rupture leading to a LOCA (Loss of Cooling Accident).

(7) PSEG does not use the most effective water chemistry methods, as discussed in writing to NRC in the late 1990s by a former PSEG employee, and thus PSEG adds additional pollution to the groundwater around Artificial Island.

(8) Salem Units 1 and 2 are vulnerable to a severe earthquake because Artificial Island is built on compacted mud, and its pilings do not reach bedrock.

(9) It is not clear that Salem Units 1 and 2 have solved all of their firewrap problems or if they still have fire watches posted in certain areas.

(10) Because Yucca Mountain, the national depository for spent nuclear fuel, will not be operative, Lower Alloways Creek will become, and actually is now, a long term nuclear waste dump, which violates the zoning board agreement between PSEG and Lower
Alloways.

(11) Salem Units 1 and 2 have buried pipes and electrical conduits that have not been inspected and, based on findings at other nuclear plants, may be leaking tritium or in danger of electrical short circuit accidents.

(12) The Evacuation Plan for Salem/Hope Creek is based on faulty assumptions and would not work under many scenarios, including a fast acting radiation release and multiple releases. Under worst case scenarios, thousands of people within the 10 and 50 mile zones would die from radiation exposure.

(13) Salem Units 1 and 2 emit continual amounts of low level radiation and radionuclides, which contribute to the cancer cases and immune system disorders in the 50 mile zone around Artificial Island.

(14) Salem Units 1 and 2 remain prime terrorist targets, and there are many ways terrorists could prevail, none of which will I list here.

(15) If NRC approves the relicensing of Salem Units 1 and 2, the people of South Jersey and Delaware will become unwitting guinea pigs in NRC's grand experiment to find out if aging nuclear plants actually can last another 20 years or not.

What should be done:

   Salem Units 1 and 2 should be decommissioned at the end of their 40 year licenses. Affected employees should be relocated and retrained by PSEG. Artificial Island should be turned into a wind power and solar power "park" to produce some of the electrical energy formerly produced by the nuclear plants.

Sincerely,

Norm Cohen
Coordinator, The UNPLUG Salem Campaign
Sent by email to NRC 11/29/09