



July 18, 2022

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Docket Nos. 05000266; 05000301  
License Nos. DPR-24; DPR-27

RE: INFORMATION MEETING WITH A QUESTION-AND-ANSWER SESSION TO DISCUSS NRC  
2021 END-OF-CYCLE PLANT PERFORMANCE ASSESSMENT OF POINT BEACH NUCLEAR  
PLANT, UNITS 1 AND 2

Dear Ms. Kozak,

Following the informational meeting held in-person on June 23, 2022, Physicians for Social Responsibility Wisconsin (PSR WI) and Nukewatch, non-profit organizations, are herein submitting the following comments and questions regarding the safety performance of Point Beach Nuclear Plant, Units 1 and 2.

On July 31, 2021, Point Beach Nuclear Reactor Unit 1 was scrammed due to mechanical failures. After a review of the NRC [Event Report 55390](#) and [the independent report](#) from PSR WI's expert, Arnold Gundersen, PSR WI views this shutdown as a failure to adequately monitor and maintain the aging components within the Point Beach reactor units.

Can you please answer the following questions in relation to the July 31st shutdown:

- How do you account for the multiple failures listed below that led to ultimate shutdown? And how have you fixed these issues to prevent future failures?
  - One of two feedwater pumps failed and half of the required cooling water entered the reactors
  - Control circuitry to reduce its power automatically failed leading to a manual shut down
  - A steam valve became stuck leading to a manual intervention to close other valves
  - A feed regulating valve failed leading to a manual intervention by operators to take control of the computer system and sent excess heat waste into atmosphere instead of Lake Michigan
- Have you inspected similar valves and pumps for mechanical deficiencies or aging mechanisms? \*Especially considering historical shutdowns due valve and pump failures on [December 13, 2005](#); [November 19, 2004](#); and July 25, 1997.
- What are the plans to prevent similar incidents from occurring in both units going forward?

Next, given the [February 9, 2022 report](#) from the NRC's Office of the Inspector General (OIG) that indicated that virtually all U.S. reactors may have sub-standard, fraudulent or counterfeit parts in them;

that NRC did not know which reactors were affected, nor what parts were sub-standard, fraudulent or counterfeit. Would you please answer the following questions:

- Is Point Beach afflicted with these parts? What parts have been identified and what are the safety implications?
- What corrective actions, if any, are required under NRC regulations?
- What corrective actions have taken place to date?
- What corrective actions are planned for the future?
- What procedural changes is NRC implementing to identify sub-standard parts?
- What is the timeline for these investigations and when will the results be reported to the public?

Point Beach Nuclear Power Plant is located directly on the shores of Lake Michigan and is [located in a Derecho corridor](#). There are safety concerns related to these environmental situations.

- Have you implemented any safety procedures at Point Beach Nuclear Power Plant after learning about the damage and shutdown of Duane Arnold Energy Plant following the Iowa Derecho in August 2020?
- How are you protecting the safety of the two reactors, high-level nuclear waste storage areas and plant operations from the variable Lake Michigan water levels and consequent erosion of the shoreline?

Embrittlement is the loss of strength, ductility and resistance to cracking. According to information from [2014](#), Point Beach Reactor Unit 2 is one of the most embrittled reactors in the country. One of our significant concerns regarding embrittlement are the safety implications of embrittled reactor pressure vessels (RPV), especially during an emergency shutdown.

- What are you doing to address the aging of the reactors in terms of embrittlement?
- Do you have a procedure in place to prevent a RPV crack?
- Are you actively testing the coupons in both reactors at Point Beach to assess the level of embrittlement? What is the basis for determining if a reactor is no longer safe in terms of its embrittlement prior to a failure?
- Will you require an autopsy of the embrittled RPV at the now closed Palisades reactor before considering a license extension for the Point Beach reactors?

Thank you for your time and assistance in understanding the safety of Point Beach Nuclear Power Plant. PSR WI and Nukewatch would appreciate answers to our questions that are in-depth and technical as well as a version of the answers that our members and the general public can understand.

PSR WI and Nukewatch request a response to our questions within three weeks from the date of this letter.

Sincerely,

Hannah Mortensen, Amy Schulz, RN, Ann Behrmann, MD, and Alfred Meyer - Physicians for Social Responsibility Wisconsin

Kelly Lundeen, Lindsay Potter, and John LaForge - Nukewatch