

NRC Commissioners  
Chairman Gregory B. Jaczko  
Kristine L. Svinicki  
George Apostolakis  
William D. Magwood, IV  
William C. Ostendorff  
U.S. Nuclear Regulatory Commission  
Mail Stop O-16G4  
Washington, D.C. 20555-0001

August, 2011

re: Bellefonte Nuclear Power Plant, and Emergency Preparedness and Truthfulness

Dear NRC Commissioners,

The members of our organizations are writing to express our opposition to the reinstatement of the NRC construction permit for the Bellefonte nuclear project and to voice concern about the inadequate emergency planning zones around nuclear reactors.

In the light of new information, we call on the NRC Commissioners to revoke reinstatement of the previously cancelled 1974 construction permit for a nuclear reactor at TVA's Bellefonte site. Given the fact that there were no NRC inspections or oversight from the period of the TVA withdrawal of the permit in 2005 until the NRC reissued the cancelled permit in 2009, and given that during this blind period the TVA kept inadequate records, stripped many critical components from the plant, and turned off the sump pumps protecting the nuclear plant foundation – we call on the NRC to require a new construction permit for Bellefonte, to ensure that current modern safety regulations are implemented and the residents of the Tennessee Valley are protected.

Beyond TVA's highly irregular attempt to circumvent the NRC permit process, there are additional safety questions that need to be addressed by a new NRC permit process:

1. The current permit is for an unproven Babcock & Wilcox (B&W) reactor design. Only one such reactor has ever been in service, in Muhlheim-Karlich, Germany, and it was terminated after only thirteen months because of seismic issues. The similar B&W designs have experienced repeated serious problems, including Three Mile Island.
2. The main Bellefonte construction was from 1974 to 1988, so the existing structures are of considerable age and stages of deterioration, making for a patch-work of construction. Already the plant has experienced the failure of the reactor containment tendon system.
3. When the construction permit was granted in 1974, the adverse and dangerous geological features of the Bellefonte site were unknown. Now we know that it is on Karst terrain with numerous sinkholes in the area, that it is within an earthquake zone, in a potential flood zone, and subject to river current reversal at the outflow and intake zones.

4. The results of the NRC study for lessons learned from Fukushima have not yet become regulations, and the Tennessee valley is vulnerable to outbreaks of the most powerful tornadoes known to man. The rash of [April 27, 2011 tornados](#) included a category EF-5 which came extremely close to Browns Ferry (with its poorly protected spent fuel cooling pools) resulting in multiple SCRAMs; an EF-4 swept close to Watts Bar; EF-2 & 3 tornados came close to the Sequoyah reactors; and EF-3 & 4 tornados swept close to the Bellefonte site.

The second issue we call on you to address is the lack of safety measures to protect the public in the 50-mile danger zone around nuclear reactors. We request that additional safety steps must include: adequate inspections and backup power for warning sirens; 50-mile radius communication and evacuation plans and practice drills; permanent provision of potassium iodide pills, instructions, and updates for the population within 50 miles of nuclear reactors; and absolute truthfulness from NRC representatives as well as industry spokespersons. You are already aware of TVA's public misrepresentations regarding the emergency response to the Browns Ferry events after the tornados. The world is witnessing the way the Japanese have misinformed their citizens, putting the Japanese children at risk by raising the radiation danger limits around Fukushima to unreasonable levels by international standards. We call on you to fulfill your mission to the American people rather than the nuclear industry, and to act now to prevent a nuclear crisis on our own soil.

Thank you for your service and for your attention to these important matters.

Very truly yours,

*Blue Ridge Environmental Defense League  
Bellefonte Efficiency & Sustainability Team  
Mothers Against Tennessee River Radiation  
Center for Health, Environment & Justice  
Nuclear Information & Resource Service  
Tennessee Environmental Council  
Nuclear Watch South  
Citizens to ENDIT  
Friends of the Earth*

