

FILE

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COMMENT DESCRIPTION:

Dear Public Service Commission,

These Comments of Opposition are being made regarding case 14-1297-EL-SSO on FENOC / Davis-Besse I am submitting these citations and respectfully request that PUCO thoroughly review these documents to ensure complete due diligence in the review of FirstEnergy rate request and rate structuring. Please review these citations to Interventions on Davis-Besse Steam Generator replacement which took place in spring of 2014. This \$600 million project Intervenor's allege has poor quality control and lack of rigorous oversight. This same type of lax oversight at similar nuclear plant San Onofre

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resulted in permanent closure because the Steam Generators made out of the same new untested alloy 690 resulted in catastrophic failure less than two years into use. The Davis-Besse Steam Generator replacement could result in this same type of failure. The first three document citations were filed by Intervenor. The prudent course is for PUCO to thoroughly review.

Expert Witness Report Of Arnold Gundersen To Support The Petition For Leave To Intervene And Request For Hearing By Beyond Nuclear (Takoma Park, MD), Citizens Environment Alliance SW Ontario Canada, Don't Waste Michigan (MI), And Sierra Club Ohio ML13141A243 05/20/2013 Adjudicatory Document - No SUNSI Review Needed, Davis-Besse 50-346-LA, EIEAutoPop, ALA, jef1, utsPARS 05000346 License Amendment, RAS 24556, 50-346-LA Beyond Nuclear, Citizens Environmental Alliance of Southwestern Ontario, Don't Waste Michigan, Fairwinds Associates, Inc, Sierra Club, Ohio Chapter 29 574.01 Kb 05/20/2013 12:00 AM EDT 05/30/2013 12:07 PM EDT

Petition To Intervene And For An Adjudicatory Public Hearing Of FENOC License Amendment Request. ML13141A250 05/20/2013 Adjudicatory Document - No SUNSI Review Needed, Davis-Besse 50-346-LA, EIEAutoPop, ALA, jef1, utsPARS 05000346 License Amendment, RAS 24555, 50-346-LA Beyond Nuclear, Citizens Environmental Alliance of Southwestern Ontario, Don't Waste Michigan, Ohio Sierra Club 21 161.45 Kb 05/20/2013 12:00 AM EDT 05/30/2013 12:07 PM EDT

Petitioners' Reply in Support of Petition to Intervene and for an Adjudicatory Public Hearing of FENOC License Amendment Request. ML13173A001 06/21/2013 Adjudicatory Document - No SUNSI Review Needed, Davis-Besse 50-346-LA, EIEAutoPop, dtp1, jef1, utsPARS 05000346 RAS 24713, ASLBP 13-928-02-LA-BD01, 50-346-LA - No Known Affiliation, Beyond Nuclear, Citizens Environmental Alliance of Southwestern Ontario, Ohio Sierra Club 19 140.47 Kb 06/21/2013 12:00 AM EDT 06/24/2013 10:31 AM EDT

In addition PUCO must make itself aware that essential Davis-Besse structure of Shield Building does not meet design basis and is out of plumb. There are 25,000 tons of Shield Building that could come crashing down with an earthquake of 2.0 or greater. Such a collapse could lead to catastrophic failure of the Davis-Besse reactor resulting in radiological contamination of Ohio, Pennsylvania, New York, Ontario Canada. In fact Canadian groups have joined as Intervenor appealing to the captured regulator the Nuclear Regulatory Commission. Intervenor demonstrate conclusively in these filings that the Shield Building cracking at Davis-Besse is getting worse and will continue to do so, placing millions of persons in peril upon collapse. Simply the Shield Building needs to be replaced and the ball park price tag will be \$1.5 to \$2.0 billion. Do not send good money after bad. The Steam Generator potential failure, and the current failure of the Shield Building to meet design basis are of but two major repairs which will be necessary at Davis-Besse - there are many more multi million dollar remedial jobs which will be necessary. PUCO must engage in rigorous due diligence. The ratepayers and the citizenry of Ohio and surrounds should not have to live in the shadow of Davis-Besse with these known and un-addressed major design flaws. The citations below speak to the continued and worsening cracking of the Davis-Besse Shield Building.

Intervenor Motion to Amend and Supplement Contention No. 7 on Worsening Shield Building Cracking and Inadequate AMPs in Shield Building Monitoring Program. ML14251A609 09/08/2014 Lodge T J 164.18 Kb Riley E-mail re Current Licensing Basis. ML14251A610 05/08/2012 Riley T NPF-003 99.33 Kb

Motion for Admission of Contention No. 6 on Shield Building Concrete Void, Cracking and Broken Rebar Problems. ML14112A007 04/21/2014 Lodge T J 124.41 Kb Exhibit 1 - Preliminary Notice of Event or Occurrence, February 19, 2014. ML14112A009 02/19/2014 83.83 Kb Exhibit 2 - Toledo Blade

Article, "Davis-Besse Had Air Gap in Shield Building," February 15, 2014. ML14112A003 02/15/2014 Henry T 170.06 Kb Exhibit 4 - Minutes of Internal Meeting of Davis-Besse Oversight Panel, October 18, 2001. ML14112A002 10/18/2001 Grobe J A 164.47 Kb Exhibit 5 - Minutes of Internal Meeting of Davis-Besse Oversight Panel, October 29, 2002 ML14112A005 10/29/2002 Grobe J A 149.1 Kb Exhibit 6 - Preliminary Notice of Event or Occurrence, September 20, 2013. ML14112A004 09/20/2013 83.65 Kb Exhibit 7 - Request for Additional Information (RAI), April 15, 2014. ML14112A008 04/15/2014 Uribe J F 238.93 Kb Exhibit 8 - Expert Witness Report of Arnold Gundersen, 50-246-LA. ML14112A006 05/20/2013 Gundersen A 187.45 Kb Exhibit 3 - Declaration of Victoria Clemons. ML14113A001 04/14/2014 Clemons V 877.21 Kb

Please do not allow for the financial bail out of the Davis-Besse nuclear power plant. Davis-Besse is a boondoggle which threatens all of our lives. Please stop the generation of highly toxic nuclear waste with which FENOC and the NRC and the DOE do not know what to do with other to continue to run their Nuclear Waste Confidence Game. Stop the Charade!

Thank you

Michael J. Keegan

Davis-Besse Intervenor