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Secretary US NRC

Comment on petition for rulemaking PRM-54-1 by Union of Concerned Scientists

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PETITION RULE PRM 54-1
(65FR 42305)

I found out about this petition and wrote NRC for a copy Oct 16, I just received it. It is difficult for the public to keep up on all these things. We don't read the Federal Register Daily.

My main concern here is a big one for the whole nuclear industry — coatings and their application and their degradation. It is of concern in the nuclear plants as well as in dry cask storage. It is clear from the petition references that Mr. Salmus report on Hatch revealed many "deficiencies" in coatings. The reference to "gaps" in the coating points clearly to "improper" application in the 1st place.

Improper application of a coating, as well as the use of the wrong coating on a surface, can cause huge problems as we saw in the hydrogen explosion at Pt. Beach with the VSC-24 cask loading. The improper coating here still has not been replaced with something safer and it should be. Now we have WEPCO wanting to load 4 more of these hazardous casks that have to keep the "coating generated" hydrogen from being set on fire by welding sparks. Makes no sense. Also we have Transtor with no solution as to the messy application of a baked on coating at Trojan (that flaked off and clouded the pool water preventing cask

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SECY-02

loading.) Has this problem been solved?

Why did the Millstone radwaste tank rupture already in 1977?? Seems strange to me. Sandy corrosion control by coating needs further evaluation by NRC and the industry. It was clear from the VSC-24 fiasco that coatings had not been given the attention needed in past history and that corrosion control is in much need of attention in all areas.

I am very interested in the Manufacturers directions on that "one coat of red oxide primer 2-4 mils" that was put on carbon steel pipe embedded in concrete after sandblasting. (p14 of petition) Were coatings properly applied at plants in the 1st place? If not — these "gaps" are a real problem as plants age and most certainly I am concerned, with U.C.S., that generic problems like those at Hatch carry over to plants like Pt. Beach. I know Hatch is Boiling Water, yet still there are many components in radwaste systems at plants dependent on very careful testing and monitoring of corrosion of radwaste systems. Aging degradation evaluation in a non enforced NRC "communication" is not called as safe for the public. We need more enforcable requirements — especially in any license renewal plan. A clear aging management program for liquid and gaseous radioactive waste systems is needed and that includes the plant and dry cask storage loading (and unloading procedures especially, which do apply here). Thank you,

Karen Shillevsland