From Projects

Orange County Response to Shearon Harris Board

1. (p. 3) Draft study does not consider relationship between degraded-core accidents and potential for severe accidents in spent fuel pools during the period after a core damage accident when areas of the plant are inaccessible due to high radiation levels. App 7 Parts 10

- 3. (p. 2 & p. 4) Draft study is deficient in that it ignores phenomena associated with partial draindown of spent fuel pools that will suppress convective heat transfer by presence of residual water at the base of the fuel assemblies.
- 4. (p. 4) Draft study is deficient in that partial drainage will lead to a steam-zirconium reaction producing hydrogen gas which could reach explosive concentrations in th atmosphere of the spent fuel building, potentially leading to a breach of that building.
- 5. (p. 5) Draft study is inaccurate with respect to its discussion of spent fuel pool accident consequences: (A) Study does not address where people who have been relocated from uninhabitable land will live while the land recovers from radioactive contamination. (B) Study does not explain regulatory basis for using 4 rem over 5 years as the threshold dose for relocation. (C) Study fails to address social and economic implications of losing the use of thousands of square kilometers of land for several generations.

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