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From: "Rippee, Fred" <frippee@komsil.com>
To: <fpc@nrc.gov>
Date: Thu, Oct 25, 2001 5:34 PM
Subject: Proposed Rule 10CFR.Parts 20 and 50, RIN 3150-AG89

October 26, 2001 (1:41PM)

OFFICE OF SECRETARY
 RULEMAKINGS AND
 ADJUDICATIONS STAFF

Mr. Cardile,

I wish to comment on the proposed rule to add entombment to power reactor decommissioning. However, in light of the current state of the US Mail in Washington D.C., I wish not to mail, but email, the Secretary, USNRC, my comments. As much of the NRC site has been shut down and several directories aren't available, would you please forward this to the appropriate person? Thank you.

My background includes employment with a utility at a BWR-6 as start-up, system, eccs and balance of plant, radwaste processing, Nuclear Safety Assurance Group, root cause analysis, and quality assurance engineer. I am an ANSI N45 certified Lead Auditor, certified SRO, registered professional engineer and degreed chemical engineer. I am pro-nuclear, and believe that we should be siting some advanced light water reactors and extending licenses, as appropriate, to further ensure self sufficient energy. With that, my comments to the rule follow.

I am concerned about entombment from the standpoint of fuel fleas. For activation products, 60 year entombment is about 0.2% of the original activity. However, for strontium or cesium, activity is about 25% of their much higher original activity at the time of plant closure. In a BWR, the RWCU, FDR, and EDR systems can transport fleas throughout the reactor primary and secondary containment buildings and through to the radwaste area. These fleas can be deposited anywhere in the piping and sump areas. When the vessel fuel is removed and the spent fuel pool is emptied, spent fuel, in the form of fleas, can and may be throughout the reactor and radwaste buildings. My personal experience has been to surprise both, the utility HP staff and myself, by picking up a 300,000 dpm flea (Sr-90) on my street shoe sole in an apparent 'clean' zone in radwaste on two separate occasions. The utility launched an immediate investigation and came up empty to find the source of the flea, both times.

My concern centers around the possibility of an assumption that after 60 years of entombment, the demolition staff digging into a plant may encounter that very flea, or fleas, that would be 75,000 dpm, without the benefit of readily available personnel with plant operational history, or a genealogy of employees to provide some kind of history, such that the source of these fleas may be discovered and dealt with. The additional question of whether spent fuel fleas constitutes a condition to maintain a license probably needs to be addressed.

In a facility that is undergoing some kind of decon and dismantlement shortly after plant closure, the culture is to consider the plant 'hot' and react accordingly. After 60 years of decayed away activation products, including personnel totally unfamiliar with the nuances and operating history of the plant in question, fleas, and their potential plant locations, would most likely not be considered.

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I understand the economics of entombing the reactor lean in the favorable direction from several monetary aspects. However, that fuel fleas may happenstance into uncontrolled and unmonitored public areas is, in my humble opinion, unacceptable and should be avoided. For the aforementioned reasons, I believe the potential for flea contamination in public areas may be increased with the application of entombment as a method of D&D. I believe that the proposed rule should be reviewed by the Commission to ensure it addresses these kinds of events. Thank you for your consideration of my thoughts in this matter.

Sincerely,

Fred Rippee, PE
Hillsboro, OR