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To: <StLucieDSEIS@nrc.gov>
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Subject: Comments of Draft Report

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Chief and Directives
Branch
Division

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Chief, Rules and Directives Branch January 13, 2003
Division of Administrative Services
U.S. Nuclear Regulatory Commission

Dear Sir:

On April 3, 2002 I presented oral comments, for the record, concerning scoping for an EIS supplement on extending the license of the St. Lucie nuclear plant. The public safety issues I presented were omitted by the NRC in publishing Supplement 11, Draft Report, NUREG-1437. I have simplified the 8 issues that were embedded in the oral comments. These issues, concerning public health and safety, need to be explained in substantial detail in the Final Report of Supplement 11, NUREG 1437 to be in compliance with the National Environmental Policy Act (NEPA), as amended.

1. The EIS needs to state the fatalities, the injuries, the economic loss, and the scope of evacuation as consequences resulting from a worst case zirconium fire in a spent fuel pool at the St. Lucie nuclear plant.
2. The EIS needs to state the probability of a zirconium fire occurring in a spent fuel pool at the St. Lucie nuclear plant. The probability calculation needs to combine accidental fires, sabotage fires, and terrorist caused fires.
3. The EIS needs to state the calculated time sequences leading to a zirconium fire as a result of sabotage or terrorist attacks.
4. The EIS needs to state the consequences, the recalculated probability, and the recalculated time sequences of a zirconium fire at St. Lucie to assist emergency preparedness administrators in creating a new evacuation plan and to assist members of the public in creating their own personal emergency plans.
5. The EIS needs to state what mitigation, if any, is available once a zirconium fire at the St. Lucie nuclear plant has started.
6. The EIS needs to state the results and conclusions of all the research in the NRC's possession related to extinguishing a zirconium fire in a spent fuel pool of a nuclear plant.
7. The EIS needs to state the probability and consequences of a zirconium fire in a spent fuel pool at St. Lucie, igniting a zirconium fire in the adjacent spent fuel pool.
8. The EIS needs to state the results of the research program concerning St. Lucie, safety issues, and terrorism that was mentioned by NRC official, Jim Medoff, at the ACRS meeting in Florida City, FL on March 13, 2002.

Respectfully Submitted

E-IDS = ADH-03

Call = H. Mesnik (MTM2)

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Mark P. Oncavage