

10/24/03
RDB
revised
[Signature]

From: "Robert R. Holt" <bobholt@capecod.net>
To: <nrcprep@nrc.gov>
Date: Sat, Dec 20, 2003 6:32 PM
Subject: PUBLIC COMMENT ON DRAFT CRITERIA ON MANUAL ACTIONS TO ACHIEVE POST-FIRE SAFE SHUTD

Chief, Rules and Directives Branch,
 Division of Administrative Services, Office of Administration
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555-0001

11/26/03
68FR66501
70

Dear sir,

As you know full well, existing law states that the Nuclear Regulatory Commission MUST require that in all nuclear generating plants, there be separate electrical systems for the automatic shut-down of the reactor and for all other operations, the former carefully protected from fire.

The NRC has been reprehensibly lax in allowing many plants to violate this requirement, creating the danger that an ordinary fire might escalate into the most dangerous nuclear disaster. It is totally unacceptable to propose the pseudo-solution of doing away with the original, prudent requirement so that the owners of nuclear plants are relieved from any financial burden.

I am therefore strongly opposed to the proposed relaxation of enforcement of current fire code that would allow non-compliant reactor operators to sacrifice automated reactor shutdown electrical systems. The proposed "solution," to substitute non-validated manual actions--require employees to risk their lives by shutting off the reactor in a burning building by hand!--would increase unacceptable and undue risks to public health and safety and the environment in the event of fire, as well as subjecting employees to outrageous danger.

Sincerely yours,

Robert R. Holt
 P.O. Box 1087
 Truro, MA 02666

K-REDO = ADM-03
 Call = R. Dudley (RFD)
 R. Gallucci (KHE)

Template = ADM-013