

**From:** "George Crocker" <gwillc@mtn.org>  
**To:** <nrcprep@nrc.gov>  
**Date:** Thu, Jan 8, 2004 2:15 PM  
**Subject:** fire protection at nuclear power reactors

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2004 JAN -9 PM 2:25  
Rules and Directives  
Branch

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

From: George Crocker, Executive Director  
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11/26/03  
68 FR 66501  
127

RE: Public Comment on Draft Criteria Regarding Manual Actions to Achieve Post-Fire Safe Shutdown  
Comment Period Open Until January 26, 2004

To Whom It May Concern:

A fire at the Browns Ferry nuclear power station in 1975 nearly caused catastrophic radiation releases. As a result, Chapter 10 Code of Federal Regulation Part 50 Appendix R Section III.G.2 was promulgated in order to ensure that public health and safety were protected by requiring automated electrical systems capable of shutting down the reactor from the control room be maintained free from fire damage in the event of a serious fire.

Many reactor operators chose to violate this rule rather than complying with it. Longstanding violations involve bogus fire barriers and other structural fire protection deficiencies that continually place the public at an elevated, unnecessary, and what should be considered an unacceptable risk. Now (The Federal Register, 11/26/2003), however, instead of finally enforcing its own rules, surprise surprise, the NRC proposes to reward the scowflaws by relaxing enforcement and allowing reactor operators to send plant workers into the reactor building during a fire to "manually operate" reactor shutdown equipment.

This substitution of non-validated and potentially suicidal manual actions for automated reactor shutdown electrical systems may save the NRC and reactor operators some money, which increasingly, seems to be what the NRC is all about. But from a public health and safety perspective, this is an absurd proposition that unacceptably increases undue risks in the event of fire.

From a regulatory oversight perspective, this relaxation is counter-productive. How does the NRC expect reactor operators to take it seriously when the consequences of longstanding and publicly acknowledged violations of rule and law is to say, "Never mind," and relax the requirement?

This proposed relaxation is typical of NRC deteriorating oversight in a time when competition in electric utility markets is pressuring the nuclear industry, including regulators, to cut costs. Unfortunately, this is also the time in which aging reactors and reactor components require increased maintenance and regulatory oversight. The trend that this proposed relaxation illustrates is therefore bound to lead to catastrophic consequences. There will, however, be survivors, and some of them are likely to find you and hold you accountable.

Sincerely,  
George Crocker, Executive Director  
North American Water Office

E-RIDS = ADM-03  
Add = R. Dudley (RFD)  
R. Gallucci (RHE)

Template = ADM-013