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618 McLaws Street
Savannah, GA 31405
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Rules and Directives
Branch
USNRC

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

11/26/03
68 FR 66501
141

Re: Public Comment on Draft Criteria on Manual Actions to Achieve Post-Fire Safe Shutdown

Sir:

As a result of the near catastrophic fire at the Browns Ferry nuclear power plant in Alabama in 1975, the NRC is mandated by federal law to require electrical systems used for the automated shutdown of the reactor from the control room be maintained free from fire damage in the event of a serious fire. I am opposed to the Commission's proposed relaxation of the current fire code (Chapter 10 C.F.R. Part 50 Appendix R Section III.G.2) that would allow non-compliant reactors to sacrifice automated reactor shutdown electrical systems and instead substitute non-validated manual actions that increase unacceptable and undue risks to public health and safety and the environment in the event of a reactor fire. It is absurd to sacrifice public health, public safety and the environment just to lower the cost of reactor operators to come into compliance with an important federal law such as this. I therefore strongly urge the NRC to abandon its proposal to relax the above referenced code.

Respectfully submitted,

Jody Lanier
Jody Lanier

E-RTDS = ADM-03

*add - R. Dudley (RFD)
R. Gallucci (RHE)*

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