

Rulemaking Comments

From: Bladey, Cindy
Sent: Tuesday, June 21, 2011 12:07 PM
To: Rulemaking Comments
Subject: FW: Request for Extension of Comment Deadline for Rulemaking Docket PRM-50-96

From: WILLAM HARRIS [<mailto:willamrharris@yahoo.com>]
Sent: Tuesday, June 21, 2011 11:47 AM
To: Bladey, Cindy
Cc: Thomas Popik
Subject: Request for Extension of Comment Deadline for Rulemaking Docket PRM-50-96

DOCKETED
USNRC

June 21, 2011 (12:30 pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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Dear Ms. Bladey:

At the request of Thomas Popik of the Foundation for Resilient Societies, I served as a reviewer in February 2011 of a Proposal for NRC Rulemaking to develop standards for on-site back-up electric power systems at NRC licensed nuclear facilities -- to better cope with solar geomagnetic disturbances that might impair off-site and on-site electric power systems affecting the safety of on-site spent fuel storage pools.

I am writing in support of an extension of the Deadline for Comments on the proposed Rulemaking (Docket PRM-50-96) because:

- It is helpful in commenting on proposed rulemaking if official findings of the regulatory agency pertaining to the proposed rulemaking are available to the public with sufficient time to integrate these findings into the analysis of commentators;
- The unanticipated loss of back-up power at Fukushima Dai-ichi Stations 1 through 3 and the loss of power and explosion affecting the spent fuel storage pool at Station 4 may well have "lessons learned" that will be reported in the July 12, 2011 Report of the NRC Staff to the Commission;
- It is my understanding that the Commission must thereafter vote on the release of the Fukushima Dai-ichi NRC Staff Report, which would reduce or altogether eliminate the time available for rulemaking commentators to analyze these findings before the July 20, 2011 rulemaking comment deadline;
- Although the loss of on-site backup power at Fukushima Dai-ichi appears to have resulted from impacts of post-earthquake tsunami waves and not solar storms generating electromagnetic pulse (EMP) , both sets of low-probability / high consequence events indicate a need for standards to eliminate or reduce the time in which back-up power to NRC licensed facilities is unavailable;
- Any proposed NRC rulemaking on mitigation for solar weather might well consider needs of related rulemaking opportunities of FERC for the protection high value transmission equipment, also relevant to reduction in system power outages, but involving costs that should not be borne exclusively by nuclear generating facilities. The National (NERC) or regional reliability corporations or FERC licensed facilities might provide as recoverable rate-payer costs system safeguards form electromagnetic pulse that should be allocated throughout the electric utility industry.
- the complexity of the proposed rulemaking and need for related FERC rulemaking, and the need to integrate findings of the NRC in its review of the Fukushima Dai-ichi Report planned for July 2011 should encourage the NRC to extend the Comment deadline for Docket PRM-50-96 from July 20, 2011 to a date at least 30 days after expected public release of the NRC Staff Report on Fukushima Dai-ichi.

Sincerely,

William R. Harris
Planned commentator on the proposed NRC Rulemaking
in Docket PRM-50-96