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PRM-50-96

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From: Sent:

To:

Mary E. Stone [mary@4fast.net] Tuesday, June 21, 2011 10:53 PM

Rulemaking Comments

Subject:

Comment in support of PRM-50-96 NRC-2011-0069

OFFICE OF SECRETARY **RULEMAKINGS AND ADJUDICATIONS STAFF**

Dear Secretary,

Rulemaking Comments

Like a lot of other Americans, and world citizens, Fukushima got my attention - big time. I have spent hours a day reading news, information, analysis & conversation about the disaster in Japan, sharing the perspective of most writers that the earthquake, tsunami & power plant failure constitute a dramatic tragedy for the Japanese people.

I have been reading since March 13th, and am considerably better informed on the operation of nuclear power plants, and the risks thereof. My previously "intuitive" objection to nuclear power is now based on more specific data. In particular, the issue of spent fuel storage is regarded as a serious, and unsolved, problem by both the pro- and anti-nuke authors I've read. And, the inexplicable laxity with which spent fuel and other deadly materials are stored in this country is almost universally condemned as a disaster in waiting. Fukushima is very bad, and not nearly resolved. Resolution may be too optimistic a hope. We've had our own near misses here in the US, most recently when a tornado disrupted power to a plant in the South, and now two separate plants at some risk due to flooding of the Missouri River. I am certain that we are not immune to a disaster quite similar to Fukushima. Failure to systematically address the safety issues of nuclear reactors in my country, with the reallife Fukushima disaster unfolding before our eyes, would be an intolerable mistake.

I am writing in support of PRM 50-96 (NRC-2011-0069) submitted by Thomas Popik and the Foundation for Resilient Societies.

This very prescient petition for rulemaking would require utilities to install reliable and renewable backup power systems, for a period of up to two years, to ensure cooling of irradiated fuel pools in the event of an extended loss of offsite power.

The Fukushima catastrophe demonstrates clearly the consequences of a loss of offsite power-to fuel pools and nuclear reactors alike. The NRC obviously must take substantive and speedy steps to address this issue.

The typical nuclear facility includes battery backup power that would last 4-8 hours, plus emergency diesel generators. While these generators were inoperable at Fukushima, and the accidents there took place in a relatively short amount of time, these generators are not designed to operate for extended periods of time.

PRM 50-96 was spawned by concern over large-scale solar flares that could cause long power outages in the U.S. As the Washington Post reported on June 21, 2011, a 2008 National Academy of Sciences study warned that a major solar storm "could knock out power in parts of the northeastern and northwestern United States for months, even years."

No U.S. nuclear reactor or fuel pool could withstand such a lengthy loss of power. Immense radiation releases would be certain.

Given the events at Fukushima, it appears nuclear facilities are not able to withstand power outages for even a fraction of that time. Thus, there is considerable urgency to improving back-up power systems.

I urge the NRC to quickly approve PRM 50-96 and to amend this petition to include suitable back-up power supplies for all nuclear reactors and fuel cycle facilities as well as the irradiated fuel pools.

Thank you,

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