

Rulemaking Comments

June 28, 2011 (4:00 pm)

From: Marcel Buob [marcelbuob@bluemail.ch]
Sent: Tuesday, June 28, 2011 6:10 AM
To: Rulemaking Comments
Subject: Comment in support of PRM-50-96 NRC-2011-0069

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Secretary,

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

As a resident of Belgium with nuclear power plants, some of which are of US designs, within 30 km from where I live, I expect the internationally influential and leading nuclear regulatory agency from a country with a considerable nuclear industry to play a leading role in preventing nuclear disasters. Spent fuel ponds are potentially seriously dangerous weak links in the event of a loss-of-power that must be safeguarded from a loss of coolant just like the reactor for extended periods, weeks or months when we look at how the events at Fukushima evolved. As an international "model" nuclear regulatory agency, it is crucial that the NRC makes strong rules to guarantee public and environmental safety and not in the best of financial interests of the operators.

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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