AP1000DCDCEm Resource

From: Loren Amelang [loren@pacific.net]
Sent: Thursday, April 21, 2011 11:00 PM
To: Rulemaking Comments
Subject: Docket ID NRC-2010-0131: Suspend the AP1000 approval

Dear Secretary Vietti-Cook,

We cannot afford to take any unnecessary risks when building nuclear reactors. Because disaster can occur at any nuclear reactor, the NRC needs to ensure that it has taken all possible precautions before moving forward with the new Westinghouse AP1000 reactor design considered for construction in Georgia, South Carolina and other states.

Especially considering the ongoing crisis in Japan and the review which will take place when the situation is brought under control, the current 75-day public comment period on the reactor design is insufficient for the new AP1000 reactor. I request that the NRC put the license application on hold until a thorough review of the Japanese accident has been conducted and weaknesses in the AP1000 design have been reviewed in light of the accident. To stick with the grossly inadequate 75-day rulemaking comment period would be the height of irresponsibility by the NRC.

Please accept the petition filed by the twelve environmental organizations of the AP1000 Oversight Group to suspend rulemaking. To ensure transparency, please include this comment and all others in the formal review proceedings and post them in the NRC's online library so the public can see any expressed concerns.

Addressing safety concerns, not satisfying the industry, should be the Nuclear Regulatory Commission's primary concern. NRC engineer John S. Ma's non-concurrence with the review of the reactor raised the possibility that the AP1000's shield building could shatter "like a glass cup." It would be indefensible for the NRC to move forward without further addressing that weakness.

Also, Westinghouse has not satisfactorily proved that the thin steel containment shell over the reactor would be effective during severe accidents or that the reactor could be properly cooled in conditions similar to those at Fukushima.

The second Google hit I looked at for the AP1000 described the April 2009 discovery of
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... a hole that had
corroded all the way through the steel
inner liner of the containment system for the Westinghouse Pressurized Water Reactor at Beaver Valley station in Pennsylvania. The source of corrosion was determined to be a small piece of wet wood left behind from the original concrete pour decades earlier that bridged the inner wall of the concrete dome and the outer wall of the inner steel liner. The outer corrosion and through-wall hole was not discovered until a visual inspection found a blister in the paint on the inside of the reactor containment wall. When the paint and rust was removed, the inside wall of the concreted containment dome was visible through the hole. Similarly, NRC reports the same outside-to-inside corrosion induced holes through inner steel liners for containments at the North Anna and Cook PWRs. The steel liner is credited for being leak tight to prevent the escape of radiation in the event of an accident.

That's without the intentional application of "passive" cooling water to the steel surface, or the constant exposure to environmental moisture through the passive venting system.

In the light of the Japanese crisis, balancing tanks of cooling water on top of the structure doesn't seem very smart, and if they did survive an earthquake or airplane strike, those tanks only hold two days of water before they must be actively refilled.

When are we going to move past these antique PWR designs to newer concepts that aren't dependent on cooling water for emergency safety?

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