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Proposed Generic Communication; Draft NRC Generic Letter 2011-XX: Seismic Risk Evaluations for Operating Reactors

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RULES OF PRACTICES

General Comment

I have over 40 years in the nuclear industry and want to submit some comments on the purposed Seismic Risk Evaluation for Operating Reactors. I want to express my concerns over how the seismic is applied in so many different formats with so many different methods and modes to complete the seismic analyses for USA NPP's. In addition, the many different ways that that NPP's reactor to an earthquake event (some with no automatic seismic scram capabilities and others with procedural requirements to manually scram after an earthquake (if the reactor didn't automatically scram) based on plant conditions upon inspection.. This is wrong. The report that I want to reference is found on http://www-pub.iaea.org/MTCD/publications/PDF/Pub1473_web.pdf.

Are the vent towers in US NPP required to have stabilizing shock absorbers? The vent towers at Fuku had them installed at some point. Even with the shock absorbers we saw vent piping that pulled away from the tower.

Without the shocks the towers would have had more damage

Auxilliary systems that back up safety systems such as diesel generators and other components that are designated as plant safety systems are not hardened nor do they meet seismic criteria and have failed recently at plants in the usa following seismic events and at the FUKUSHIMA reactors.

I have many more examples of issues with the seismic concerns at the plants in USA and would be very willing to testify and/or add additional information. Another example is the fault like which North Anna was build on "active fault line" and even with warning from local citizens the construction went on and today we have seen the consequence of allowing it with the recent seismic events at that facility which prompted the NRC to dispatch the highest level of inspectors to the plant. Please let me know how I can provide additional information. Regards, DEan

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