

**Rulemaking Comments**

**PRM-50- 96  
(76FR26223)**

**From:** DENNIS R. NELSON, Energy-Environmental Researcher [dennisnelson987@yahoo.com]  
**Sent:** Saturday, September 17, 2011 5:29 PM  
**To:** Rulemaking Comments  
**Subject:** MY COMMENT IN SUPPORT OF "PRM 50-96 (NRC-2011-0069)!!!!!"

DOCKETED  
USNRC

September 19, 2011 (8:50 am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Dear Secretary,

I support "PRM 50-96 (NRC-2011-0069)" which as been submitted by Engineer Thomas Popik and the Foundation for Resilient Societies. This very well-researched petition for rulemaking would require electric utilities to install reliable and renewable onsite emergency backup power systems, for a period of up to two years, to ensure cooling of "irradiated ('spent') fuel storage pools" in the event of an extended loss of offsite power.

The Fukushima (Japan) nuclear disaster demonstrates clearly the consequences of a loss of offsite power--to "irradiated ('spent') fuel storage pools" and nuclear reactors alike. The U.S. Nuclear Regulatory Commission (USNRC) 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 diesel generators were inoperable at the Fukushima nuclear complex, and the accidents there took place within a relatively short period of time, these diesel generators are NOT designed to operate for extended periods of time.

Interestingly enough, "PRM 50-96 (NRC-2011-0069)" was 'spawned' by concern over larger-scale solar flares which could cause longer-term 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 American nuclear light-water reactor or "irradiated ('spent') fuel storage pool" could withstand such a lengthy loss of power!! Immense releases of deadly ionizing radiation would be certain!

Given the events at Fukushima, it appears that our nuclear facilities are NOT able to withstand power outages for even a fraction of that time. As a result, there is considerable urgency to immediately improving onsite emergency back-up power systems.

I urge the USNRC to quickly approve "PRM 50-96 (NRC-2011-0069)," and to amend this petition to include suitable onsite emergency back-up power supplies for ALL U.S. nuclear reactors and commercial nuclear fuel- cycle facilities as well as the "irradiated ('spent') fuel storage pools."

Thank you!

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