

To: Leeds, NRR
Ref. Q20110757

Jaegers, Cathy

From: Eleanor Amidon [eamidon@hotmail.com]
Sent: Tuesday, November 01, 2011 8:26 AM
To: Borchardt, Bill
Subject: safety first at North Anna nuclear reactors

Cys: EDO
DEDMRT
DEDR
DEDCM
AO
OGC

Mensah, NRR
Banic, NRR
Scott, OGC
Bowman, OEDO

Dear Mr. Borchardt:

I wish to be a co-signer on the "Request for Emergency Enforcement Action to Suspend the Restart and Operation of the North Anna Nuclear Generating Station, Mineral, Virginia, per CFR 10.2.206." I understand this specifies the five items listed below.

Thank you.

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- 1) Prior to the restart approval of North Anna Units 1 and 2, Virginia Electric Power Company shall submit a formal license amendment request to the NRC to reanalyze and re-evaluate the North Anna nuclear power station's design basis for earthquakes in order to obtain a license amendment that is supported by new seismic evaluation and plant retrofit;
- 2) Prior to restart approval NRC shall require that both North Anna Units 1 and 2 be subject to the same level and rigor of deterministic inspections and safety analyses that include the full reactor core offload inspections of the condition of safety-related reactor core internals, fuel core assemblies and control rod mechanism for both units to reasonably assure the same level of deterministic oversight of both units and a focus on public health and safety over a industry production agenda;
- 3) Virginia Electric Power Company shall be required to reanalyze and re-qualify the adequacy and condition of the Lake Anna dam given the North Anna nuclear power station's Design Basis Earthquake criteria was exceeded by the earthquake on August 23, 2011 so as to provide reasonable assurance of the one mile long earthen dam's reliability as a reactor safety-related structure;
- 4) Given the historical evidence that Virginia Electric Power Company was fined for making significant and deliberate material false statements to the federal licensing agency affecting the original North Anna Design Basis Earthquake criteria and given that the site's earthquake design criteria were exceeded by the August 23, 2011 earthquake, the NRC shall Order that Virginia Electric Power Company (Dominion) be held accountable for all further representations of material fact regarding the two unit North Anna reactor being sited on an earthquake fault and further reanalysis and plant modifications by making a formal license amendment request with the opportunity for full public hearings rights;
- 5) Virginia Electric Power Company must reanalyze and re-evaluate its Independent Spent Fuel Storage Installations' pads and dry casks in light of the damage done to them and the impacts documented at them due to the August 23rd earthquake, in order to determine that seismic safety and stability is reasonably assured going forward at North Anna nuclear power plant; likewise, NRC must verify that its earthquake safety regulations for dry cask storage, including 10 CFR § 72.212(b)(2) (i)(B) and 10 CFR § 72.212(b)(3), are in full regulatory compliance and not being violated, as well as for its dry cask Certificates of Compliance and dry cask technical specifications at North Anna. These re-analyses and re-evaluations require re-writing both the Safety Evaluation Report and the Safety Analysis Report in regards to the ISFSIs, as well as strengthening technical design criteria for dry cask storage at North Anna to reasonably assure seismic safety. Both VEPCO and NRC must publicly ensure that dry cask radiation shielding and cask cooling systems, structures, and components were not negatively impacted by the earthquake damage and impacts of August 23rd, 2011, in order to adequately protect worker and public safety and health and the environment, and to reasonably assure regulatory compliance, given the high radiological hazards represented by the irradiated nuclear fuel storage within the ISFSIs.