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Notice of Receipt and Availability of Application for Renewal of Columbia Generating Station Facility Operating License

Comment On: NRC-2010-0029-0015

Energy Northwest, Columbia Generating Station; Notice of Availability of Draft Supplement 47 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants and Public Meetings for the License Renewal of Columbia Generating Station

Document: NRC-2010-0029-DRAFT-0072

Comment on FR Doc # 2011-22415

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RULES AND PROCEDURES

General Comment

See attached file(s)

Attachments

WPSR, NRC Comments on CRS, 11.16.11

SUNSI Review Complete

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November 16, 2011

Comments on Relicensing of the Columbia Nuclear Station(CNR), Energy Northwest(ENW), Tri-Cities, Washington State

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From: Tom Buchanan, Vice-President, Washington Physicians for Social Responsibility
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Late Notice: WPSR requests a two month delay on the EIS deadline, due to the announcement on November 14, 2011: "Loss of Technical Support Center Emergency filtration System. We demand that at least two months are needed to see the sequence of events, timing and ENW's and NRC's response to these undersized filtration gaskets causing an inhability to the inside atmosphere at the reaction station. See also item#7 below in our comments, "B&W's \$50M. suit against ENW for the "Excessive Condensor Replacement Delays" of October 21, 2011."

Remembering Fukushima, 3.11.2011- Lessons for US Nuclear Reactor Safety

Now 8 months after the 9.0 Earthquake and Tsunami in Fukushima Japan, the resulting nuclear devastation and on-going radiation contamination, we see little celebration for any learning curve developing during the hearings conducted by NRC and Energy Northwest in Washington and Oregon States.

In reviewing FOIA communications between the NRC and ENW, we see only the NRC's request that ENW conduct a more concentrated review of the nuclear reactor's pipe corrosion. This is totally unacceptable.

Even following some of the highlights of your own NRC Task Force Commission's review of Fukushima of July 12th, 2011, "Review of Insights from Fukushima Dai-Ichi Accident", we should assume that your Reactor Licensing Division would have studied and taken to heart several suggestions from this Task Force. For example:

1. on page viii, "low likelihood, high consequences events such as prolonged station BLACKOUT resulting from severe natural phenomena" ...such as seismic and flooding protection of each reactor should be planned in the worst case scenario. Given the increased research into the history of seismic activity now being studied in the Eastern

Washington basin, and the impact of seismic-caused flooding, the current plan for cooling backup systems should be much longer than the current 24 hour maximum backup.

2. The Task Force's recommendation of "requiring reliable Hardened Venting Designs in the Boiling Water Reactors (BWR)"-Fukushima and CRS are the same reactors that would be more resistant to Hydrogen Gas built up and explosion if new venting were added.

3. So-called 'Spent Fuel ponds'(really, radiated fuel storage vats) according to the Task Force should "identify insights about Hydrogen Control and mitigate inside the containment and other buildings".

4. They go on to say, "Enhancing Spent Fuel pool make-up capability and instrumentation on the spent fuel pools should be improved."

We must conclude that the lessons from Fukushima have landed on dead ears inside the Nuclear Reactor Licensing division of the NRC. It's not that we agree with all the statements and recommendations of NRC's Task Force.

For example, at the very beginning of the Task Force Executive Summary, they say, "we appreciate(!) that an accident involving core damage and uncontrolled release of radiation to the environment, *even one without significant health consequences is inherently unacceptable.*" ***We cannot accept this statement.***

In the document by the "Trio of Experts Outline Eight Key Concerns: ...US Regulatory Response Seen as Troubling", Dr. Andrew Kanter, National PSR president says on items 3 and 4: "The Japanese Government's decision to increase the maximum allowed dose for citizens of Fukushima (including Children) from 1 mSv per year to 20mSv, the equivalent of 200 chest x-rays or the maximum many countries allow for nuclear workers... is unacceptable and remains in place despite vehement public and international pressure." He says further, "There are about 350,000 children under 18 in Fukushima Prefecture. If each of these children were exposed to the 20 mSv maximum over 2 consecutive years, the National Academy of Sciences BEIR VI report would predict 2,500 additional cancer deaths..."

We want the US Regulators to respond to this statement of medical impacts on Japanese children and not to forestall the serious lessons that we all should apply to our own 104 nuclear reactors in various stages of aging in their life process, within a natural environment which is much more threatening than the estimates and computer simulations have allowed for up to March 11, 2011.

Back to NRC's licensing process at the Columbia Reactor Station, in summary, we want the NRC to respond to the following and require CRS to abide by the new standards:

1. Put more security in place at and around the reactor site in response to the events of 9/11,
2. Respond to the catastrophe of Fukushima's Spent Fuel Pool explosions and the three reactors' core meltdown of nuclear fuel by immediately adding additional safeguards.
3. Emergency planning zones and equipment for major earthquake and flooding must be upgraded,
4. Loss of power backup emergencies must be greater than a 24 hour scenario,
5. A more careful summarizing and measuring of the Fukushima disaster must be carried out by the US NRC. For example, a recent Japanese estimate of the amount of Cesium releases at Fukushima has been the equivalent of 168 Hiroshima bombs' worth. Most of that Cesium has gone into the sea. We will see and may swallow many of the results of that Cesium impact for many years to come,
6. We want all speculation and planning for MOX plutonium fuel option to be ended at CRS. The licensing of this additional load of radioactive nuclides in the plutonium fuel rods, even with only a 15% of the reactor fuel load, would increase, according to the American Nuclear Society, a nuclear industry organization's report on March 25, 2011, the amount of nuclear contamination during an accident by up to 40%. MOX is unstable and more unsafe than low enriched uranium based fuel rods.
7. Finally, we want to speak directly to Babcock and Wilcox's \$50 Million suit against ENW for "Damaged Condenser Delay" on October 21, 2011. Most importantly, a hydrogen explosion occurred due an improper draining of the pipes, leaving hydrogen to build up and explode creating "an unusual event" report to the NRC . The NRC commented at the time that: "We are doing a special inspection to gain more insights into the incidents involving the condensor and the outage (over 120 days) work." We demand the EIS process be delayed until this NRC inspection report is released and reviewed by the public.

Do not gloss over the medical consequences of Fukushima, Three Mile Island or Chernobyl's radiation releases. There is no such thing as a safe threshold of radioactive releases from nuclear power. The NRC needs to build their models of health damage from their nuclear power stations with the lack of a "safe threshold" in mind.

Thank you for your attention.