

NRR-PMDAPEm Resource

From: saporito3@gmail.com on behalf of Thomas Saporito [thomas@saprodani-associates.com]
Sent: Thursday, September 29, 2011 4:25 PM
To: Thompson, Jon
Cc: Jaczko, Gregory; DeMiranda, Oscar
Subject: Supplemental Information for 2.206 petition record
Attachments: 2011.09.08 Letter to NRC DeMiranda.pdf

Mr. Thompson:

In accordance with discussions held this date with the NRC Petition Review Board (PRB) in connection with an Enforcement Petition filed under 10 C.F.R. 2.206, against the North Anna Nuclear Plant, Units 1 & 2, please find a copy of a September 8th, 2011, letter sent to Oscar DeMiranda, Senior Allegations Coordinator for Region II related to the licensee and the North Anna Nuclear Plant.

Please ensure that this 2-page document is placed in the record accordingly and please send me an email confirmation.

Kind regards,

Thomas Saporito, Senior Consultant
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Sent Date: 9/29/2011 4:24:40 PM
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From: saporito3@gmail.com

Created By: saporito3@gmail.com

Recipients:

"Jaczko, Gregory" <Gregory.Jaczko@nrc.gov>
Tracking Status: None
"DeMiranda, Oscar" <Oscar.DeMiranda@nrc.gov>
Tracking Status: None
"Thompson, Jon" <Jon.Thompson@nrc.gov>
Tracking Status: None

Post Office: mail.gmail.com

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Options

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Reply Requested: No
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Recipients Received:

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September 8th, 2011

Oscar DeMiranda
Senior Allegations Coordinator
U.S. Nuclear Regulatory Commission
U.S. NRC Region II
Marquis One Tower
245 Peachtree Center Avenue N.E., Suite 1200
Atlanta, GA 30303

In re: North Anna Nuclear Plant

Dear Mr. DeMiranda:

This communication serves to alert the U.S. Nuclear Regulatory Commission (NRC) about considerations at the North Anna Nuclear Plant (NANP) which appear to have nuclear safety-related implications which should be of interest to the NRC in protecting public health and safety under 10 C.F.R. §50; and under other NRC regulations and requirements for operation of NANP.

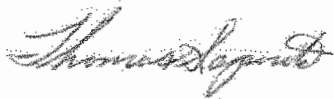
As you are aware, the nuclear reactors at NANP were recently automatically tripped off-line (SCRAM) as a direct result of the effects of an earthquake in the Virginia area. The event was unexpected by the licensee and appears to have caused seismic movement at the NANP outside the safety design basis of the facility as reflected in the licensee's Final Safety Analysis Report (FSAR) under 10 C.F.R. §50. Notably, the licensee's post-event laboratory analysis of the facility's scratch plates indicates that the horizontal ground acceleration was greater than had been postulated in the plant's design basis. Moreover, in 1973, the licensee initiated a dig for the foundation of a third nuclear reactor which was later abandoned; however, at the time, a visiting geology professor informed a licensee executive at (Virginia Electric & Power), that a geologic fault existed at the site. A subsequent NRC investigation resulted in a \$32,000 monetary penalty assessed against the licensee in connection with the failure to promptly disclose the discovery. The NRC staff at the time, was reprimanded by the agency's Atomic Safety & Licensing Board (ASLB) for failure to timely bring the information to the attention of the panel members. For these reasons, the NRC is urged to take the following actions:

- Inspect and validate the facility's ceramic insulators located on the high-voltage power lines associated with the off-site power distribution system and switch-yard for cracks and breakage. The inspection should include replacement of any suspected defective component; and enhanced inspection with equipment capable of detecting flaws which are undetectable with the naked eye.

- Inspect and validate the facility's electrical relays, circuit breakers, and switches for damage where such physical damage may not be detected with the naked eye; and where said relays could have sustained damage from the earthquake which would cause their failure when required.
- Assess whether the facility meets its safety design basis under 10 C.F.R. §50, since post-event laboratory analysis appears to indicate that the seismic movement at the facility was outside the licensee's FSAR.
- Assess whether spent nuclear fuel storage facilities could topple or otherwise sustain significant damage from a more powerful earthquake which would result in a release of nuclear radioactive particles into the environment.
- Assess the licensee's emergency plans to evaluate whether they are sufficient to deal with an emergency situation where spent nuclear fuel storage facilities are significantly damaged as a result of a severe earthquake.
- Assess whether the licensee should be permitted to restart the nuclear reactors at the facility given the unknown intensity and/or frequency of any future earthquake events near the facility; and in consideration that the recent earthquake had a seismic result outside the plant's safety design basis under 10 C.F.R. §50.

The cooperation of the NRC in addressing the above nuclear safety concerns in connection with the NANP in a timely and meaningful manner which protects public health and safety and the environment, is both anticipated and appreciated.

Kind regards,



Thomas Saporito
Senior Consultant

Sent via electronic mail to:
Oscar DeMiranda
Senior Allegations Coordinator

Copy sent via electronic mail to:
Hon. Gregory Jaczko
Chairman of the NRC