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ACTION OFFICE: EDO

To: Leeds, NRR  
Ref. G20110262

AUTHOR: Marvin Lewis

AFFILIATION: PA

ADDRESSEE: Nuclear Regulatory Commission

SUBJECT: Submission of comments to NAS-NRC Committee

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DEDMRT  
DEDR  
DEDCM  
AO  
RI  
OGC  
Mensch  
Baric  
Scott  
Bowman

ACTION: .Appropriate

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ACKNOWLEDGED No

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## Champ, Billie

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**From:** Marv Lewis [marvlewis@juno.com]  
**Sent:** Thursday, December 01, 2011 1:33 PM  
**To:** aceactivists@comcast.net; cturnbull@necnp.org; fran@hazam.org; frieda302@comcast.net; gizmogink@optonline.net; jamilus@jamilus.com; johnsrud@uplink.net; josephoconnor666@comcast.net; michaelbft48@comcast.net; Rulemaking Comments; traci@energyjustice.net; crs@nas.edu  
**Subject:** Submission of comments to NAS-NRC Committee.

From: Marvin Lewis  
3133 Fairfield St.  
Philadelphia, PA 19136  
215 676 1291

To: NAS Committee to assess cancer risks around NRC licensed facilities.

Re: Comments allowed by NAS.

Dear Sirs and Ms:

The NRC has practices which promote a lack of safety in contradiction to their chartered requirement to "protect the health and safety " of the public. I have sent comments in previously joining with Beyond Nuclear. This submission extends those comments while continuing to agree with the Beyond Nuclear comments of September 23, 2011.

Presently I do not see in these studies any reality to the present condition of the economy. All these studies seem to have the assumption that the rules , regulations and attitudes will meet the requirements of the NRC and good practice.

Finances and the economy: I suggest that the study should include the chance that the licensee will not have the finances to meet the requirements of rules , regulations and good practice.

Other regulations and practices which disagree with reality or the World as it is include: 'Single failure criterion': SFC was explained to me by NRC lawyers and engineers to mean that if one safety related item fails in an accident scenario, only one other safety related item may be assumed to fail in the analysis of that scenario.

Earthquake and Sunami prediction: Edges of tectonic plates were previously assumed to be the major players in earthquake loci. Recent evidence and earthquakes have shown that anywhere on a tectonic plate can be as likely to experience earthquakes as the edges. The same is true with sunamis. Sunamis can exceed predictions by orders of magnitude. Sunamis can cross oceans, such as the cliff fall prediction of Los Palmas generating sunamis of 100' on the East Coast of the Americas.

Explosivity of zirconium: This has been ignored for decades. The NRC allowed a PRM on the explosivity of zirconium into litigation recently. (PRM 50-93.)

I could go on for pages, but rather than bore the reader , I shall not. I respectfully suggest that the Committee looks at the many issues which the NRC has failed to address adequately, such as sunamis following earthquakes. I request that the present committee addresses issues instead of tossing them into the wastebbin of 'generic.'

Respectfully submitted,

Marvin I. Lewis, R. P. E. (Retired).

12/01/2011.