

# PUBLIC SUBMISSION

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## Submitter Information

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*77 FR 5281*

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## General Comment

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Item 2

The ingenuity and persistence of the Fukushima Daiichi operators and their managing supervisors is seriously overlooked on page 94 where 8 hour station batteries are given credit for powering some instrumentation. INPO Report 11-005, page 8 clearly states that flooding caused the 8 hour batteries to be lost. Operators were sent out to gather batteries from cars parked there at the station. After they brought them into the control room, they hooked them up and got them to work. I think that deserves some mention. The reference is INPO Report 11-005, page 26. (And, if it wasn't a workday, you would have to expect that they wouldn't have had enough car batteries available.)

Item 3

I don't have a page reference but I don't know how you do not address the need for cooling torus water within 15 to 30 minutes of the time you start dumping steam to the torus water by way of the relief valves (to lower reactor pressure).

Item 4

What is the present day reliability of steam driven pumps installed on old BWRs? It sound good (in theory) that we can black start and black run these steam pumps. However, just last month, Wolf Creek couldn't keep a steam driven pump running more that 12 hours. (Ref. US NRC PNO-IV-12-002)

Item 5

*E-RFS-ADM-03*

I would be a whole lot happier if, when you say that the U.S. NRC says that storage of fuel in a high-density configuration in spent fuel pools is safe, you also say "as long as no structural damage occurs to the elevated spent fuel pool structure".

*SUNSI Review Complete*  
*Template = ADM-013*

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