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Station Blackout

March 22, 2012 (1:20 pm)

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General Comment

About the first question, it is clearly that a deep modification and revision of the design bases for all plants must be performed, Fukushima was placed in a very dangerous place. Some plants are 20 or more years old, a period of weather change. Floodings or other more extreme situations are expected to happen. The site was chosen for a operation period of 40 years, however nuclear power seems to be available for a very long period of time, reactors could be operating in this site for more than 200 years, therefore records from only 2000 last years could be not enough.

Some events are inconsistently analyzed, if we have a large LOCA with pipe rupture, we can not expect that D/G will be available or other equipment, therefore I consider that severe damage of the core must be considered, modeling core melting, tools for this exist such as MAAP or MELCOR

About the second question I consider, yes, AP-1000, ESBWR or other designs consider explicetly core melting, core catchers and cooling systems of the core exist, with passive systems. We must consider if this mitigation capabilities can be installed in the old plants. Core catchers could be installed in all plants, protected auxiliary D/G also, cooling systems of melted core.

Another issue is the fuel in the reactor pools, the amount of fuel in the pools should be limited, 5-10 years old fuel can be cooled in dry cask with air, therefore the amount of fuel inside the reactor should be limited to 3-5 reloads. This should reduce the thermal load of pools (not too much) but should reduce the source term and simplify the handle of the fuel after an accident, it seem almost incredible, actually I'm not sure this is true, Mark-I reactor building contains most of the expent fuel generated in the reactor. The reduction of the pool could generate an extra inventory to cool

the melted core.

About flood I think yes, the flood considered should be larger as long as the climate change could change in 50 years.

Rulemaking Comments

From: Gallagher, Carol
Sent: Thursday, March 22, 2012 8:30 AM
To: Rulemaking Comments
Subject: Comment on Station Blackout Mitigation ANPR
Attachments: NRC-2011-0299-DRAFT-0003.pdf

Van,

Attached for docketing is a comment on the above noted ANPR (77 FR 16175; March 20, 2012) from Javier Haces that I received via the regulations.gov website on March 21, 2012.

Thanks,
Carol