

Rulemaking Comments**ANPR 50
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From: Tom Gurdziel [tgurdziel@twcny.rr.com]
Sent: Tuesday, March 27, 2012 8:18 AM
To: Rulemaking Comments
Cc: 'Lyon, Jill'; 'Holden, Tammy'
Subject: Docket ID NRC-2011-0299

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF**C. Rulemaking Objectives/Success Criteria****Question 1 Response**

The main objective of the SBO rule should be to avoid nuclear fuel damage in the BWR core.

I have no comment here about PWRs or spent fuel pools.

Question 2 No comments**Question 3 Response**

What are you asking here? Here is the problem: we have to cool the nuclear fuel in the reactor vessel. We have about 2 hours to start and continue doing this. Otherwise, anybody or anything from offsite will not be providing relief, and a stable shutdown will not occur.

Question 4 Response

No comments other than I do not believe EOPs and SAMGs are available for me to read.

Question 5 Response

If you insist on maintaining a rupture disk in series with a hardened vent path from the torus for BWR Mark I and Mark II plants, I believe you are ensuring plant accident ventilation failure and resulting reactor core failure. You need 2 PARALLEL ventilation paths like I saw in session TH34 at RIC2012. (I believe it was shown on slide 9 of 14 in the Swedish presentation.)

I think of it this way: a series rupture disk will ensure failure to vent the primary containment and thus, melted fuel.

Question 6 No comments

Thank you,

Tom Gurdziel

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