UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE NUCLEAR REGULATORY COMMISSION

In the Matter of

EA-12-051

All Operating Boiling Water Licensees

With Mark 1 and Mark II Containments

April 12, 2012

PILGRIM WATCH SUPPLEMENT TO REQUEST FOR HEARING REGARDING INSUFFICIENCY OF ORDER MODIFYING LICENSES WITH REGARD TO SPENT RELIABLE SPENT FUEL POOL INSTRUMENTATION

Pilgrim Watch ("PW") through its representative, Mary Lampert, respectfully submits the attached new information:

- On site Spent Fuel Criticality Analyses, NRR Action Plan, March 19, 2012
- All things Nuclear, Fission Stories #87: NRC Resolves Humongous Nuclear Safety Problem, David Lochbaum, Union Concerned Scientists, April 10, 2012
- Fukushima Daiichi Site: Cesium-137 is 85 Times Greater Than at Chernobyl Accident, Akio Matsumura, including March 25, 2012 letter to the Honorable Ban Ki-moon from Ambassador Mitsuhei Murata, akiomatsumura.com
- Improving Spent-Fuel Storage at Nuclear Reactors, Robert Alvarez, Science and Technology, Univ. Texas at Dallas, 2012.

The documents are believed by PW to be new, significant and material to the U.S. Nuclear Regulatory Commission's ("Commission") consideration of PW's Request for Hearing on EA-12-051, currently before the Commission, and relevant to the Commission's obligation under NEPA. All four exhibits support the Petitioner's contention that EA-12-051 is insufficient to protect public health, safety and property because it lacks a requirement for licensees to re-equip their spent fuel pools to low-density, open-frame design and storage of assemblies >5 years removed from the reactor core placed in dry casks.

On site Spent Fuel Criticality Analyses, NRR Action Plan, March 19, 2012 shows that the "conservatism/margin in spent fuel pool (SFP) criticality analyses has been decreasing" due to: increased U235 enrichment; increased fuel pellet diameter; increased fuel pellet density; BWR transition from fuel assemblies with 49 fuel rods to those with 91 fuel rods; increased use of fixed and integral burnable absorbers; changes to core operating parameters due to power uprates resulting in more reactive fuel assemblies stored in SFP; and last, the permanently installed neutron absorbers, for which a history can be established, have exhibited degradation.

NRC Resolves Humongous Nuclear Safety Problem, David Lochbaum, Union Concerned Scientists, April 10, 2012 shows the potential risk and consequences of heavy load drops in spent fuel pools was "resolved" by NRC, after 35 years, by "requiring absolutely no action whatsoever on the part of plant owners."

Fukushima Daiichi Site: Cesium-137 is 85 Times Greater Than at Chernobyl Accident, Akio Matsumura, including the *March 25, 2012 letter to the Honorable Ban Ki-moon from Ambassador Mitsuhei Murata* shows the severity of the situation in Unit 4's spent fuel pool. *Improving Spent-Fuel Storage at Nuclear Reactors*, Robert Alvarez shows the importance of low-density, open-frame storage, dry casks, and financing options.

PW respectfully requests that these documents be included in the record.

Respectfully submitted,

Mary lampert

(Signed Electronically)

Pilgrim Watch, director 148 Washington Street Duxbury, MA 02332 Tel. 781-934-0389 Email: mary.lampert@comcast.net April 12, 2012

EXHIBITS

Sup. Exh. 1	On site Spent Fuel Criticality Analyses, NRR Action Plan, March 19, 2012
Sup. Exh. 2	All things Nuclear, Fission Stories #87: NRC Resolves Humongous Nuclear Safety Problem, David Lochbaum, Union Concerned Scientists, April 10, 2012
Sup. Exh. 3	Fukushima Daiichi Site: Cesium-137 is 85 Times Greater Than at Chernobyl Accident, Akio Matsumura, including March 25, 2012 letter to the Honorable

Sup. Exh. 4 Improving Spent-Fuel Storage at Nuclear Reactors, Robert Alvarez, Science and Technology, Univ. Texas at Dallas, 2012.

Ban Ki-moon from Ambassador Mitsuhei Murata, akiomatsumura.com