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Order Modifying Licenses

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**Comment On:** NRC-2012-0069-0003  
Interim Staff Guidance JLD-ISG-2012-02; Compliance with Order EA-12-050, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents

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Comment on FR Doc # 2012-13806

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77 FR 33777

## Submitter Information

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## General Comment

I read Draft Rev 0 of JLD-ISG-2012-02, which is Interim Staff Guidance on compliance with Order EA-12-050 on BWR Mk I & Mk II containment venting.

As I understand it, the order requires a vent system that can handle 1% reactor decay heat or less (in steam) with the primary containment at full design pressure. This system has apparently been around for a number of years, long enough, (I have read on a General Electric Internet page), that such hardened vent systems were actually installed in the Fukushima Daiichi plants operating on March 11, 2011.

So, how did they work?

Fukushima Daiichi Unit 1 had a hardened vent but its reactor core was not saved.

Fukushima Daiichi Unit 3 had a hardened vent but its reactor core was not saved.

Fukushima Daiichi Unit 2 had a hardened vent and it did not work. Its reactor core was not saved.

It is my conclusion that the design bases of this proposed BWR Mk II plant addition are inadequate.

Why install on BWR Mk II containments a system that has been demonstrated in accident conditions to not work on the BWR Mk I containments?

*SUNSI Review Complete  
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Add = R. Fretz (RFX)*