

# PUBLIC SUBMISSION

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**Docket:** NRC-2012-0068  
Order Modifying Licenses

**Comment On:** NRC-2012-0068-0002  
Interim Staff Guidance JLD-ISG-2012-01; Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

**Document:** NRC-2012-0068-DRAFT-0004  
Comment on FR Doc # 2012-13810

## Submitter Information

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**Organization:** Erwin Citizens Awareness Network, Inc.

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## General Comment

Ref: NRC Docket 07000143; License SNM-124, attention is called to NRC Integrated Inspection Report 70-143/2012-002 and Notice of Violation and Temporary Instruction 2600/015 Inspection Report No. 70-143/2012-006 (ML12122A186). See specifically Pages 11 and 12, which addresses Earthquake, Winds, and Floods for this licensee.

**Earthquake:** Licensee located in the Appalachian Tectonic Belt with a Seismic Zone 2 designation, indicating moderate damage corresponding to Intensity VII on the Modified Mercalli scale.

Inspectors reviewed seismic design documentation for the Commercial Development Line and Uranyl Nitrate Bldg. Licensee could not provide seismic design information for Bldg 333 (corresponding to IROFS PREP-A and PREP-B). The sprinkler system in the UNB is designated as IROFS UNB-V. Design specification, Drawing No. 510-UNB-800, "BLEU Conversion Complex Uranyl Niatrate Bldg Fire Protection Plan and Details," Rev. 0 stated, in part, "Piping shall be braced per Zone 2 seismic forces in accordance with NFPA 13." Licensee was unable to provide detail installation documentation for the sprinkler system bracing by the end of the inspection.

**Wind.** Licensee could not provide wind design information for Bldg 333.

**Flood.** Northern portion of NFS site is within the 100-year flood plain of Martin Creek. Facilities on the northern portion of the site are below an elevation of approx 1640 ft. (laboratories and Waste Water Treatment Facility (WWTF)) may experience flooding conditions of 1 to 2 ft. for a 100-yr flood (Dewberry & Davis, Martin Creek Flood Plain, 1997). Operation of the WWTF and

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laboratory facility may be affected due solely to the displacement of operating staff.

Question compliance with Table 2.2 license application regarding management measures for IROFS PREP-

A and PREP-B, and if IROFS UNB-V seismic bracing was installed in accordance with NFPA 13 requirements.