

August 31, 2012

MEMORANDUM TO: Sean E. Peters, Chief
Human Factors and Reliability Branch
Division of Risk Analysis
Office of Nuclear Regulatory Research

FROM: Robert E. Kahler, Chief */RA Kevin Williams for/*
Inspection and Regulatory Improvement Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

SUBJECT: COMMENTS ON "STATEMENT OF WORK FOR ASSESSING THE
SUCCESS PROBABILITIES OF MITIGATIVE ACTIONS FOR
SEISMICALLY INDUCED SPENT FUEL POOL DAMAGE"

Thank you for the opportunity to comment on the subject document. The Office of Nuclear Security and Incident Response, Division of Preparedness and Response would like to provide input to the subject statement of work.

Major Comments:

1. From an offsite consequences and emergency preparedness perspective, the mitigative success that is of the utmost importance is to prevent release from the building of more than about 10% of the available Cesium (Cs). In some cases the moderate leak accident damages the clad but only releases a small percentage of Cs. Therefore, we suggest that a Cs release criterion be used instead of, or in addition to, the gap release criterion. The available response time should reflect the time to prevent significant release of Cs, in addition to perhaps the time to prevent any clad damage.
2. Plant equipment is not the only equipment that could mitigate the accident. For example, a fire truck provided from offsite would be effective for the small leak and would slow down the damage caused by the moderate leak. We recommend the study should consider offsite equipment, at least in so far as it can be readily provided.

CONTACT: Randy Sullivan, DPR/NSIR
(301) 415-1123

Minor Comments:

1. State-of-the-Art Reactor Consequence Analyses performed a review of the likely roadway damage around Peach Bottom due to a seismic event and found the network to largely be intact. Although river crossings could be damaged, the roads north of the plant would likely be unaffected. This should allow sufficient staff to support the plant in a timely manner.
2. The event is self revealing to responders and a portion of plant staff would become aware of the event rapidly. They would likely attempt to report to the plant as soon as they assure family safety. Corporate support would follow within hours. We recommend that the study assume immediate (e.g. 1 hour) recognition of the leaking plant operations.
3. Peach Bottom does not use High Density fuel configurations; therefore, the analysis should not consider the High Density cases for either small or moderate holes.

cc: R. Sullivan, NSIR

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cc: R. Sullivan, NSIR

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OFFICE:	NSIR/DPR/IRIB	NSIR/DPR/IRIB:BC	NSIR/DPR/DDEP	NSIR/DPR
NAME:	RSullivan	RKahler (RSullivan for)	MThaggard (KWilliams for)	RLewis
DATE:	08/28/12	08/28/12	08/28/12	08/31/12

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