

From: deveronz@yahoo.com
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident;
Date: Monday, May 14, 2012 11:25:34 AM

Below is the result of your feedback form. It was submitted by
(deveronz@yahoo.com) on Monday, May 14, 2012 at 11:26:33

comments: What is being done TODAY to stop the threat of Japan's Fukushima nuclear reactor # 4 and possible death and distruction to the Northern hemisphere? What is being done to ensure damage can be minimal to the reactor's rods in the case of tsunami or earthquake? Please take this threat seriously. Please tell me what measures are being taken to correct and confine the damaged reactor.

Thank you,
Deveron Speck
deveronz@yahoo.com
503-737-9099

name: Deveron Speck

organization:

address1: 33694 S. Dickey prairie rd.

address2:

city: Molalla

state: OR

zip: 97038

country: USA

phone: 503-737-9099

From: [Tom Gurdziel](#)
To: [Mitchell, Matthew](#)
Cc: [CHAIRMAN Resource](#); hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "Vanags, Uldis"; [JLD Public Resource](#); [Screnci, Diane](#)
Subject: NEI 12-06 Draft B Comment
Date: Monday, May 14, 2012 9:49:23 PM

Hello Matt,

I just read over the first 65 of 99 pages of this draft very quickly and like what I saw, except for one thing. If you read section 11.6.5, I believe you will see a recommendation to train (on something I don't specifically recall) only once in 8 years. How about once every requalification test period, which, I now believe has been extended from the 1 year it was in the past, to two years today.

Otherwise, I see a lot of high quality work here.

Thank you,

Tom

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: [hillsc@INPO.org](#); [Bridget.Frymire@dps.ny.gov](#); [Screnci, Diane](#); [P.Kaiser@iaea.org](#); [jicc@ws.mofa.go.jp](#);
[JLD Public Resource](#); "[Newal Agnihotri](#)"; "[Vanags, Uldis](#)"
Subject: Fukushima-related Comments for 5-21-2012
Date: Monday, May 21, 2012 8:31:14 AM

Good morning,

Inerting Confined Spaces

Recently I have read a couple of times that efforts are continuing to be made to keep the Fukushima Daiichi Unit 1 and Unit 2 and Unit 3 primary containments inerted.

I don't know how this is being done.

However, I have come across information that inerting oil cargo tanks on big (tanker) ships is common. In fact it is apparently necessary in order to satisfy requirements.

Two methods (of the ones I have seen identified) appear worth a closer look for use both at Fukushima Daiichi and as regional-based FLEX equipment here in the United States. I believe one method uses incinerated diesel fuel oil to provide an inert gas. The other starts out with diesel engine exhaust. It is cooled, sulfur is removed, and then I believe it is ready for use.

(Initial attempts to inert ship oil tanks began in 1933 and were undertaken by Sun Oil Company.)

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; [Screnci, Diane](#); P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); ["Newal Agnihotri"](#); ["Tom Henry"](#); ["Vanags, Uldis"](#); ESTRONSKI@aol.com
Subject: Fukushima-related Comments for 5-22-2012
Date: Tuesday, May 22, 2012 10:39:25 PM

Good morning,

Is This a "Win – Win" Idea?

How can you satisfy two groups of people with what appears to be completely opposite demands? (I am talking today's commercial nuclear power industry here.) One group doesn't want that local nuclear reactor back at power and (maybe even some of that group), plus others, want more electrical generation than they presently have.

I think I have the solution.

Decommission the reactor building and repower the associated turbine-generator with energy from a non-nuclear source.

Makes sense, doesn't it?

It probably means:

- Lower total cost resulting from beyond-design basis external events
- No big security cost (due to no nuclear fuel)
- No elevated, non-safety related pool of water containing spent nuclear fuel
- No need for primary or secondary containment
- No need for extensive emergency planning
- No need for extensive plant contingency (EOP) procedures
- No need for on-site safety-related electrical generation
- Less heat discharged to the environment due to higher thermal efficiency
- No need to acquire large sums of money for plant decontamination and no (lengthy) SAFSTOR
- Reduced need for emergency plan exercises

Potential Applications:

- Crystal River 3, 1 unit
- Fukushima Daiichi, 6 units
- Fukushima Daini, 4 (?) units
- San Onofre, 2 units

Thank you,

Tom Gurdziel

From: terry@scottnterry.net
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident;
Date: Wednesday, May 23, 2012 4:40:20 PM

Below is the result of your feedback form. It was submitted by
(terry@scottnterry.net) on Wednesday, May 23, 2012 at 16:39:47

comments: My daughter is an MD stationed at Misawa AFB Japan, North of Fukishima. I believe that the waste from Fukishima is in the water and air, not only in Japan, but across the pacific to the West Coast, where my family lives. I would like to know what testing of the water, air, and food taken from the water is being done ... and how frequently it is accomplished. Have you published any papers about this? May I have references? Thank you.

name: Terry McFarlane

organization:

address1: 5960 S Vivian St

address2:

city: Littleton

state: CO

zip: 80127

country: USA

phone: 7202325596

From: [Raleigh, Deann](#)
To: [JLD Public Resource](#)
Subject: Is this a FINAL draft ISG that will be issued for public comment?
Date: Thursday, May 24, 2012 1:09:23 PM
Attachments: [OGI0YzJkYzQtZjFIMi00OTRmLWlxZDktYTY2MzUyOTI0MDI1.pdf](#)

Dear JLD:

I came across the attached document and wanted to verify that this is in fact the final draft version that will be published in the FRN for comment?

Thanks,

Deann

Deann Raleigh

Nuclear Regulatory Services
Scientech, a business unit of Curtiss-Wright Flow Control Company
240-626-9556
draleigh@curtisswright.com

This e-mail and any files transmitted with it are proprietary and intended solely for the use of the individual or entity to whom they are addressed. If you have reason to believe that you have received this e-mail in error, please notify the sender and destroy this email and any attached files. Please note that any views or opinions presented in this e-mail are solely those of the author and do not necessarily represent those of the Curtiss-Wright Corporation or any of its subsidiaries. Documents attached hereto may contain technology subject to government export regulations. Recipient is solely responsible for ensuring that any re-export, transfer or disclosure of this information is in accordance with applicable government export regulations. The recipient should check this e-mail and any attachments for the presence of viruses. Curtiss-Wright Corporation and its subsidiaries accept no liability for any damage caused by any virus transmitted by this e-mail.

From: siegfriedpfeiffer@hotmail.com
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";
Date: Saturday, May 26, 2012 3:57:51 PM

Below is the result of your feedback form. It was submitted by
(siegfriedpfeiffer@hotmail.com) on Saturday, May 26, 2012 at 15:57:32

comments: there are approx. 8 million people within a 50 mile radius of San Onofre, if we have an event like in Japan there will be total chaos unable to quickly get out of said area! This plant could be converted to an Natural Gas Powerplant just as they did in Colorado! Concerned resident 33 miles down-wind, Siegfried G. Pfeiffer

name: Siegfried G. Pfeiffer

organization: Resident

address1: 13727 Nogales Drive

address2:

city: Del Mar,

state: CA

zip: 92014

country: USA

phone: 858-755-1042

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; [Screnci, Diane](#); P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; "[Newal Agnihotri](#)"; "[Tom Henry](#)"; "[Vanags, Uldis](#)"; [JLD Public Resource](#)
Subject: Fukushima-related Comments for 5-28-2012
Date: Monday, May 28, 2012 9:46:32 AM

Good morning,

Original Building Dimensional Tolerances

I am seeing reports that there is a 1 inch or more "deflection" of some (not clearly identified) part of the Fukushima Daiichi Unit 4 structure. Was it there from construction days or not? Well, one way to provide a little credibility that it has been around a long time is to go to the other 5 units at that site and find a similar bulge.

Chances are, although the various units may have been constructed by different management in different construction companies, the craft labor was significantly the same for all. So, if bulges were accepted practice at one unit, you should find them on the others as well.

If you can't find them, then I would say there is a serious concern that the deflection is no more than one year old and may even be currently increasing. Specifically, this may be an actual sign that failure is underway.

I also did not see any report that the deflection was NOT on a part of the Unit 4 spent fuel structure. Until I read differently, I will be concluding that it is the spent fuel pool structure with this problem.

Thank you,

Tom Gurdziel

From: vmdato@aaphp.org
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident;
Date: Tuesday, May 29, 2012 7:36:35 AM

Below is the result of your feedback form. It was submitted by
(vmdato@aaphp.org) on Tuesday, May 29, 2012 at 07:36:20

comments: I am President Elect of the American Association of Public Health Physicians. (aaphp.org) One of our members has written the resolution below because of her concern about bioaccumulation of radiation in Salmon and other migratory fish. Are there any plans to monitor fish? If not, are we missing a key fact? Is there any reason not to submit this resolution and/or is there any way we can improve it. Thank you in advance for your assistance with this question and for your time, diligence and public service.
Virginia Dato

Title: Preventable potential cancer pandemic.
Whereas the 2011 collapse of the nuclear reactor in Fukushima Japan created abundant radioactive overflow coolant water that was released into the Pacific Ocean; and

Whereas the Summary of the April 2012 Congressional Research Service report "Effects of Radiation from Fukushima Dai-ichi on the U.S. Marine Environment" states that: "Barring another unanticipated release, radioactive contaminants from Fukushima Dai-ichi should be sufficiently dispersed over time that they will not prove to be a serious health threat elsewhere, unless they bioaccumulate in migratory fish or find their way directly to another part of the world through food or other commercial products."

Whereas we find no published federal plans to monitor Pacific Wild Salmon's radioactive safety, nor any such plans through discussions with FDA or CDC, although Pacific Wild Salmon are clearly in a cohort of fish that will have had the opportunity to migrate through radioactive plumes and be exposed to radioactive environments (including prey) from Fukushima; therefore be it

Resolved, that our AMA immediately request the CDC, FDA, NOAA, and/or other appropriate federal agencies to:

1. investigate and appropriately monitor radiation levels of foods harvested in the Pacific (including migrating salmon), and promptly and fully release findings, together with information about any health implications of consuming these foods; and
2. encourage public policies that reduce the risk of radioactive contamination of fish and other commercial products.

References

-Congressional Research Service

<http://www.fas.org/sgp/crs/misc/R41751.pdf>

- [http://www.straight.com/article-](http://www.straight.com/article-663186/vancouver/feds-not-testing-salmon-radiation)

663186/vancouver/feds-not-testing-salmon-radiation

-

[http://www.nytimes.com/2012/05/25/world/a](http://www.nytimes.com/2012/05/25/world/asia/radioactive-release-at-fukushima-plant-was-underestimated.html?_r=2)

sia/radioactive-release-at-fukushima-plant-was-underestimated.html?_r=2

The justification for the delay is that the importance of the problem was not clear until the Congressional Research Service piece in April 2012 and the May 25 2012 Reuters/NYTimes article on the upwards revised estimates of dose, which stated "It is difficult to judge the health effects of the larger-than-reported release, since even the latest number is an estimate, and it does not clarify how much exposure people received or continue to receive from contaminated soil and food." We have the chance, for the first time in history that I can think of, to completely prevent a human cancer pandemic, and to do so by just checking a few extra fish from the supermarkets near the Winchester Massachusetts FDA fish lab.

name: Virginia Dato MD MPH FACPM FAAP

organization: American Association of Public Health Physicians

address1:

address2:

city:

state: ---

zip:

country:

phone: 4125135368

From: [Erica Frank, MD, MPH](#)
To: [JLD_Public_Resource](#)
Cc: [Virginia Dato](#); [Arvind Goyal](#); [Joe Murphy](#); [Tim Barth](#)
Subject: Re: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";
Date: Monday, June 04, 2012 1:27:55 PM

Dr. Dato, our colleagues, and I thank you for your response. However, we are unable to identify anyone within EPA who would be appropriate to respond to this query -- who might you suggest?

Gratefully,
Erica

Erica Frank, MD, MPH

From: JLD_Public Resource <JLD_Public.Resource@nrc.gov>
Date: June 4, 2012 7:35:33 AM EDT
To: "vmdato@aaphp.org" <vmdato@aaphp.org>
Subject: RE: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";

Dr. Dato,

The NRC does not perform or generally require environmental monitoring outside of licensee site boundaries. Please contact the US Environmental Protection Agency with your inquiry because this type of radioactivity monitoring is within their jurisdiction.

Thank you for contacting the Japan Lessons Learned Project Directorate.

Japan Lessons Learned Project Directorate
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission

-----Original Message-----

From: vmdato@aaphp.org [mailto:vmdato@aaphp.org]
Sent: Tuesday, May 29, 2012 7:36 AM
To: JLD_Public Resource
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";

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concern about bioaccumulation of radiation in Salmon and other migratory fish. Are there any plans to monitor fish? If not, are we missing a key fact? Is there any reason not to submit this resolution and/or is there any way we can improve it. Thank you in advance for your assistance with this question and for your time, diligence and public service.
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References

-Congressional Research Service

<http://www.fas.org/sgp/crs/misc/R41751.pdf>

- [http://www.straight.com/article-](http://www.straight.com/article-663186/vancouver/feds-not-testing-salmon-radiation)

663186/vancouver/feds-not-testing-salmon-radiation

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[http://www.nytimes.com/2012/05/25/world/a](http://www.nytimes.com/2012/05/25/world/asia/radioactive-release-at-fukushima-plant-was-underestimated.html?_r=2)

sia/radioactive-release-at-fukushima-plant-was-underestimated.html?_r=2

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name: Virginia Dato MD MPH FACPM FAAP

organization: American Association of Public Health Physicians

address1:

address2:

city:

state: ---

zip:

country:

phone: [4125135368](tel:4125135368)

From: EDFINACG@aol.com
To: [JLD Public Resource](#)
Cc: kosteljr@westinghouse.com; michael.rencheck@areva.com; elyman@ucsusa.org; eric.gardner@ge.com; Spk@nei.org; ryang@epri.com
Subject: NTTF Tier 1 and Tier 3 recommendations comment
Date: Tuesday, May 29, 2012 2:07:24 PM

This e-mail is a public comment to the Tier 1 and Tier 3 NTTF recommendations, and more specifically the issue of filters for containment vents and atmospheric releases/hydrogen explosions from accidents at operating light water nuclear power plants.

I want the NRC staff to know that I have developed a USPTO pending patent to prevent atmospheric releases from accidents at operating nuclear power plants and provide adequate protection of the population and the environment in such cases. My passive solution is a comprehensive holistic approach to atmospheric releases whatever the scenario for the reactors or spent fuel pools and whatever the success of the corresponding FLEX mitigation strategies. My solution is also, but not only, a cost effective alternative solution to containment vents filters for Mark 1 and 2 designs. My solution can be applied to any light water nuclear reactor facility. It can be installed without interference with the facility SSCs and can passively operate during any accident scenario to prevent atmospheric radioactive releases whatever the release path and damage to the nuclear fuel.

I am available to present confidentially my project to the designated NRC staff at your earliest convenience.

Sincerely,

Catherine GAUJACQ
Consultant Power/Nuclear industry
STERLING VA 20165
phone 703-598-0295
edfinacg@aol.com

From: EDFINACG@aol.com
To: JLD_Public_Resource
Cc: kosteljr@westinghouse.com; michael.rencheck@areva.com; elyman@ucsusa.org; eric.gardner@ge.com; Spk@nei.org; ryang@epri.com
Subject: Re: NTTF Tier 1 and Tier 3 recommendations comment
Date: Monday, June 04, 2012 11:31:59 AM

Thank you for your response. I understand from your response that a NRC Licensee would have to buy my patent and then submit it for NRC review.

The purpose of my patent is to protect the public and the environment from atmospheric releases from accidents at operating nuclear power plants. It seems there is little interest for the NRC Licensees to buy my patent since it does not prevent the destruction of the NRC Licensee's assets (nuclear fuel damage).

Who should I address my patent for consideration? Should I address my request to the EPA? Should I address my request to the DOE? I would appreciate if you could direct me to the correct US government agency.

Thanks in advance for your time and consideration,
Catherine Gaujacq

In a message dated 6/4/2012 7:34:01 A.M. Eastern Daylight Time, JLD_Public.Resource@nrc.gov writes:

Ms. Gaujacq,

The NRC does not accept private organizations' submittals for review unless a current licensee(s) commit(s) to the submittal's actions or it is contained within a license application. Your patent would need to be submitted by a current or future licensee before it will undergo NRC review.

Thank you for contacting the Japan Lessons Learned Project Directorate.

Japan Lessons Learned Project Directorate

Office of Nuclear Reactor Regulation

US Nuclear Regulatory Commission

From: EDFINACG@aol.com [<mailto:EDFINACG@aol.com>]
Sent: Tuesday, May 29, 2012 2:07 PM
To: JLD_Public_Resource
Cc: kosteljr@westinghouse.com; michael.rencheck@areva.com; elyman@ucsusa.org;

eric.gardner@ge.com; Spk@nei.org; ryang@epri.com
Subject: NTF Tier 1 and Tier 3 recommendations comment

This e-mail is a public comment to the Tier 1 and Tier 3 NTF recommendations, and more specifically the issue of filters for containment vents and atmospheric releases/hydrogen explosions from accidents at operating light water nuclear power plants.

I want the NRC staff to know that I have developed a USPTO pending patent to prevent atmospheric releases from accidents at operating nuclear power plants and provide adequate protection of the population and the environment in such cases. My passive solution is a comprehensive holistic approach to atmospheric releases whatever the scenario for the reactors or spent fuel pools and whatever the success of the corresponding FLEX mitigation strategies. My solution is also, but not only, a cost effective alternative solution to containment vents filters for Mark 1 and 2 designs. My solution can be applied to any light water nuclear reactor facility. It can be installed without interference with the facility SSCs and can passively operate during any accident scenario to prevent atmospheric radioactive releases whatever the release path and damage to the nuclear fuel.

I am available to present confidentially my project to the designated NRC staff at your earliest convenience.

Sincerely,

Catherine GAUJACQ

Consultant Power/Nuclear industry
STERLING VA 20165
phone 703-598-0295
edfinacg@aol.com

=

Catherine Gaujacq
Consultant Power/Nuclear industry

STERLING VA 20165
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From: EDFINACG@aol.com
To: JLD_Public_Resource
Cc: kosteljr@westinghouse.com; michael.rencheck@areva.com; elyman@ucsusa.org; eric.gardner@ge.com; Spk@nei.org; ryang@epri.com
Subject: Re: NTTF Tier 1 and Tier 3 recommendations comment
Date: Tuesday, June 05, 2012 9:15:32 AM

Thank you very much for those precisions. I look forward to the NRC staff and Commission upcoming discussions and decisions.

Catherine Gaujacq

In a message dated 6/5/2012 8:02:50 A.M. Eastern Daylight Time, JLD_Public.Resource@nrc.gov writes:

Ms. Gaujacq,

You are correct in that an NRC licensee would need to buy your patent and then submit it for NRC review. The NRC would not conduct a review unless it was formally submitted by a licensee and would not provide it to our licensees for their consideration.

As for who to address for consideration, your patent for an atmospheric release prevention system is most relevant to electricity-creating reactors due to their high power output, all of which are under the jurisdiction of the NRC. All other reactors in the US are research reactors with very low power levels. Your best chance for consideration would be with NRC licensees. Other US government agencies are not relevant.

For your information, the issue of filtered vents will go in front of the 5-member Commission in late summer or early fall for consideration. Depending on the outcome of these meetings, licensees could be required to install filtered vents and your patent could be considered as an alternative.

Thank you for contacting the Japan Lessons Learned Project Directorate.

Japan Lessons Learned Project Directorate
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission

From: EDFINACG@aol.com [<mailto:EDFINACG@aol.com>]
Sent: Monday, June 04, 2012 11:31 AM
To: JLD_Public_Resource
Cc: kosteljr@westinghouse.com; michael.rencheck@areva.com; elyman@ucsusa.org; eric.gardner@ge.com; Spk@nei.org; ryang@epri.com
Subject: Re: NTTF Tier 1 and Tier 3 recommendations comment

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Ms. Gaujacq,

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Thank you for contacting the Japan Lessons Learned Project Directorate.

Japan Lessons Learned Project Directorate

Office of Nuclear Reactor Regulation

US Nuclear Regulatory Commission

From: EDFINACG@aol.com [mailto:EDFINACG@aol.com]

Sent: Tuesday, May 29, 2012 2:07 PM

To: JLD_Public Resource

Cc: kosteljr@westinghouse.com; michael.rencheck@areva.com; elyman@ucsusa.org; eric.gardner@ge.com; Spk@nei.org; ryang@epri.com

Subject: NTTF Tier 1 and Tier 3 recommendations comment

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I am available to present confidentially my project to the designated NRC staff at your earliest convenience.

Sincerely,

Catherine GAUJACQ

Consultant Power/Nuclear industry
STERLING VA 20165
phone 703-598-0295
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=

Catherine Gaujacq
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The information contained in this message and attachments is confidential and is intended for the addressee(s) only. If you have received this message in error please notify the originator immediately. The unauthorized use, disclosure, copying or alteration of this message is strictly forbidden.

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; [Screnci, Diane](#); P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); ["Newal Agnihotri"](#); ["Tom Henry"](#); ["Vanags, Uldis"](#); [Bowman, Gregory](#); ESTRONSKI@aol.com
Subject: Fukushima-related Comments for 5-31-2012
Date: Thursday, May 31, 2012 8:28:59 AM

Good morning,

100 degrees F. per hour

Suppose you are an on-duty plant operator. If you knew you had a choice to either cooldown the reactor vessel at 100 degrees F. per hour or prevent the reactor core from melting, I am sure that you would choose to save the core. But suppose that choice was not apparent, as it was not at Fukushima Daiichi Unit 1 on March 11, 2011?

Does it make sense for us to continue to require a cooldown rate of 100 degrees F. per hour (or less) in accident conditions when time is critical, given that this was instrumental in destroying the Unit 1 reactor core?

Yet, after more than a year, I have still not seen any identification that the existing cooldown rate is no longer defensible in accident situations. Or is it?

How about somebody taking a look at the possible (accident) value of a fast cooldown by emergency condensers, (which is a passive system)?

Thank you,

Tom Gurdziel

From: Debbie@C-10-.org
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";
Date: Thursday, May 31, 2012 11:15:12 AM

Below is the result of your feedback form. It was submitted by
(Debbie@C-10-.org) on Thursday, May 31, 2012 at 11:15:02

comments: The ACRS Additional Recommendations on your home page will ot allow me to read it...too small to read printed out. it can be enlarged only on yuour site but not copied

name: Debbie Grinnell

organization: C-10 Foundation

address1:

address2:

city: Newburyport

state: MA

zip: 01950

country: USA

phone: 978-465-646

From: [Raleigh, Deann](#)
To: [JLD Public Resource](#)
Subject: Prioritization for Seismic Walkdowns?
Date: Friday, June 01, 2012 5:50:40 PM
Attachments: [flooding_hazard_evaluation.pdf](#)

Dear Sir,

Has the NRC issued a prioritization list for plants to perform seismic walkdowns (Recommendation 2.3) similar to what was done with the flooding prioritization (see attached)?

Thank you.

Best,

Deann

Deann Raleigh

Nuclear Regulatory Services
Scientech, a business unit of Curtiss-Wright Flow Control Company
240-626-9556
draleigh@curtisswright.com

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From: [Virginia Dato](#)
To: [JLD_Public_Resource](#)
Cc: [Arvind Goyal](#); [Joe Murphy](#); [Tim Barth](#); [efrank3g@gmail.com](#)
Subject: Re: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";
Date: Tuesday, June 05, 2012 8:22:59 AM

Dear Japan Lessons Learned Project Directorate

We will be grateful for any assistance in finding the correct responsible competent agency for testing migratory fish for radiation. I am beginning to think that there might not be one. As I look at this website -which I don't believe has been updated since May 2011 - <http://www.fda.gov/newsevents/publichealthfocus/ucm247403.htm#sofar> it appears that the FDA has the expertise. However if they see their role as technically only testing imports than fish that swim and are caught here would not be under their jurisdiction. As a public health physician I would much prefer to know that an appropriate federal agency is quietly testing fish than for us to attempt to pass a resolution at the AMA where the press might misconstrue and over estimate the risk if any. I think the bottom line is that we really can't know what long distance migratory fish such as salmon and tuna are capable of bioaccumulating without testing. If the tests are low than that will be a wonderful lesson learned and if the tests are high I prefer to learn my lesson thorough testing than through an increase in cancer further down the road. If there is evidence that testing is not needed that that would be great, just let us know!.

Thank you again for your patience and any assistance with this issue,

Sincerely,

Ginny

Virgina Dato MD MPH FACPM FAAP

President-Elect AAPHP

aaphp.org

On Mon, Jun 4, 2012 at 1:27 PM, Erica Frank, MD, MPH <efrank3g@gmail.com> wrote:

Dr. Dato, our colleagues, and I thank you for your response. However, we are unable to identify anyone within EPA who would be appropriate to respond to this query -- who might you suggest?

Gratefully,

Erica

Erica Frank, MD, MPH

From: JLD_Public Resource <JLD_Public.Resource@nrc.gov>

Date: June 4, 2012 7:35:33 AM EDT

To: "vmdato@aaphp.org" <vmdato@aaphp.org>

Subject: RE: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";

Dr. Dato,

The NRC does not perform or generally require environmental

monitoring outside of licensee site boundaries. Please contact the US Environmental Protection Agency with your inquiry because this type of radioactivity monitoring is within their jurisdiction.

Thank you for contacting the Japan Lessons Learned Project Directorate.

Japan Lessons Learned Project Directorate
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission

-----Original Message-----

From: vmdato@aaphp.org [mailto:vmdato@aaphp.org]

Sent: Tuesday, May 29, 2012 7:36 AM

To: JLD_Public Resource

Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident;

Below is the result of your feedback form. It was submitted by

(vmdato@aaphp.org) on Tuesday, May 29, 2012 at 07:36:20

comments: I am President Elect of the American Association of Public Health Physicians.

(aaphp.org) One of our members has written the resolution below because of her concern about bioaccumulation of radiation in Salmon and other migratory fish. Are there any plans to monitor fish? If not, are we missing a key fact? Is there any reason not to submit this resolution and/or is there any way we can improve it. Thank you in advance for your assistance with this question and for your time, diligence and public service.

Virginia Dato

Title: Preventable potential cancer pandemic.

Whereas the 2011 collapse of the nuclear reactor in Fukushima Japan created abundant radioactive overflow coolant water that was released into the Pacific Ocean;
and

Whereas the Summary of the April 2012 Congressional Research Service report "Effects of Radiation from Fukushima Dai-ichi on the U.S. Marine Environment" states that: "Barring another unanticipated release, radioactive contaminants from Fukushima

Dai-ichi should be sufficiently dispersed over time that they will not prove to be a serious health threat elsewhere, unless they bioaccumulate in migratory fish or find their way directly to another part of the world through food or other commercial products.”

Whereas we find no published federal plans to monitor Pacific Wild Salmon's radioactive safety, nor any such plans through discussions with FDA or CDC, although Pacific Wild Salmon are clearly in a cohort of fish that will have had the opportunity to migrate through radioactive plumes and be exposed to radioactive environments (including prey) from Fukushima; therefore be it

Resolved, that our AMA immediately request the CDC, FDA, NOAA, and/or other appropriate federal agencies to:

1. investigate and appropriately monitor radiation levels of foods harvested in the Pacific (including migrating salmon), and promptly and fully release findings, together with information about any health implications of consuming these foods; and
2. encourage public policies that reduce the risk of radioactive contamination of fish and other commercial products.

References

-Congressional Research Service

<http://www.fas.org/sgp/crs/misc/R41751.pdf>

- [http://www.straight.com/article-](http://www.straight.com/article-663186/vancouver/feds-not-testing-salmon-radiation)

663186/vancouver/feds-not-testing-salmon-radiation

-

http://www.nytimes.com/2012/05/25/world/asia/radioactive-release-at-fukushima-plant-was-underestimated.html?_r=2

The justification for the delay is that the importance of the problem was not clear until the Congressional Research Service piece in April 2012 and the May 25 2012 Reuters/NYTimes article on the upwards revised estimates of dose, which stated "It is difficult to judge the health effects of the larger-than-reported release, since even the latest number is an estimate, and it does not clarify how much exposure people received or continue to receive from

contaminated soil and food." We have the chance, for the first time in history that I can think of, to completely prevent a human cancer pandemic, and to do so by just checking a few extra fish from the supermarkets near the Winchester Massachusetts FDA fish lab.

name: Virginia Dato MD MPH FACPM FAAP

organization: American Association of Public Health Physicians

address1:

address2:

city:

state: ---

zip:

country:

phone: [4125135368](tel:4125135368)

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: [hillsc@INPO.org](#); [Bridget.Frymire@dps.ny.gov](#); [Screnci, Diane](#); [P.Kaiser@iaea.org](#); [jicc@ws.mofa.go.jp](#); [JLD_Public_Resource](#); ["Newal Agnihotri"](#); ["Tom Henry"](#); ["Vanags, Uldis"](#); [Bowman, Gregory](#); [ESTRONSKI@aol.com](#); [rich@oswegocounty.com](#); [barclaw@assembly.state.ny.us](#); ["Holden, Tammy"](#)
Subject: Fukushima-related Comments for 6-5-2012
Date: Tuesday, June 05, 2012 8:34:55 AM

Good morning,

I have read JLD-ISG-2012-02 and believe it gives advice on installing the defined "reliable hardened containment vent" on BWR Mark II containment plants. Although I do not have the documented reference, I recall reading on a General Electric Internet page the fact that these same systems were installed on the Fukushima Daiichi BWR plants operating on March 11, 2011. (This is the day of their accidents.)

They did not work (in an accident).

For example, INPO Special Report 11-005, page 88, 4th item up from the bottom states in part: "Containment pressure was lower than the working pressure of the rupture disk at 62 psig (427 kPa gauge), so venting did not occur." (This is reported a little more than 3 days after the start of the accident.)

Or

Page 89, for 15 Mar at 0300, "Containment pressure exceeded maximum design pressure, and operators again attempted to vent the containment to reduce pressure but were unsuccessful."

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: [hillsc@INPO.org](#); [Bridget.Frymire@dps.ny.gov](#); [Screnci, Diane](#); [P.Kaiser@iaea.org](#); [jicc@ws.mofa.go.jp](#);
[JLD Public Resource](#); ["Newal Agnihotri"](#); ["Tom Henry"](#)
Subject: Fukushima-related Comments for 6-6-2012
Date: Wednesday, June 06, 2012 8:25:02 AM
Attachments: [Unit 4 rigging_lower.jpg](#)

Good morning,

Unloading the Unit 4 Spent Fuel Pool

Has the use of a crane outside the building been considered? The attached sketch shows approximately how this would work. (You just have to draw in the upper part of the boom and rigging, which I am unable to show.)

If you can't pick and rotate the load, (which is a small cask with a few bundles of spent nuclear fuel), consider picking the load and walking the crane (and the load) backwards. (We used this walking method to place big fan rotors, (I don't remember: either Induced Draft or Forced Draft), inside two boiler houses just north of New York City in about 1970.)

Finding Primary Containment Leaks at Unit 2

Last month it was announced that an inspection would be done at Unit 2 to look for leaks. Has this been completed by the end of the month? What were the results? Will flooding proceed?

Thank you,

Tom Gurdziel

(From recent pictures, it looks like they already have big cranes on site with approximately a 350 ton "sister hook" on one of them.)

From: [Tom Gurdziel](#)
To: [OPA Resource](#)
Cc: [CHAIRMAN Resource](#); [Screnci, Diane](#); [hillsc@INPO.org](#); [Bridget.Frymire@dps.ny.gov](#); "[Vanags, Uldis](#)"; "[Newal Agnihotri](#)"; "[Tom Henry](#)"; [JLD Public Resource](#); "[Lyon, Jill](#)"; "[Holden, Tammy](#)"
Subject: Comments on JLD-ISG-2012-02
Date: Thursday, June 07, 2012 8:22:51 AM

Good morning,

It is June 7 and I am getting a message that "comments not accepted" so that I cannot make any comments on the BWR Primary Containment Venting requirements.

What is the problem?

Thank you,

Tom Gurdziel

From: k.cohen1@cox.net
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";
Date: Thursday, June 07, 2012 2:11:24 PM

Below is the result of your feedback form. It was submitted by
(k.cohen1@cox.net) on Thursday, June 07, 2012 at 14:11:30

comments: In relation to what seems a very high potential for a further Fukushima disaster please consider the following positive suggestion.

It is well documented that chlorophyll combats radiation poisoning. As a result of this fact, it would seem of potential benefit to first test chlorophyll on a small quantity of radioactive material. If the chlorophyll lessens the radiation I suggest the following steps be taken in Japan.

The first step would be to produce with the use of kelp, spirulina, alfalfa, etc. a few million gallons of liquid chlorophyll. The cost would be relatively low in terms of the potential benefits.

The second step would be to spray, inject or in any plausible way infuse the radioactive material and pools at Fukushima with the liquid chlorophyll. This might lessen the danger of that radiation.

In a very simple observation, it would be wise to include at the site of a potential nuclear explosion and the ensuing radioactive fallout a healthy potentially antidotal substance or substances that would be vaporized and dispersed with the radioactive material to thus protect many people from its ill effects. The wide dispersal of chlorophyll would be good for people and plants as well as soil.

Even if the test indicates no lessening of radioactivity on inorganic material it would still be life saving to place in the atmosphere with the poison radiation a known organic defense against that poison.

Thank you for your consideration.

Best wishes,

Ken Cohen
k.cohen1@cox.net

name: Ken Cohen

organization:

address1: 130 W. Victoria St.

address2:

city: Santa Barbara

state: CA

zip: 93101

country:

phone: 805-845-4184

From: [Tom Gurdziel](#)
To: [JLD Public Resource](#)
Cc: [OPA1 RESOURCE](#); [OPA2 Resource](#); [Resource, OPA3](#); [OPA4 Resource](#); [ESTRONSKI@aol.com](#); [CHAIRMAN Resource](#); [Bowman, Gregory](#); [OIGHOTLINE Resource](#); [Bridget.Frymire@dps.ny.gov](#); [hillsc@INPO.org](#); "Vanags, Uldis"; [P.Kaiser@iaea.org](#); [jicc@ws.mofa.go.jp](#); "Tom Henry"; "Newal Agnihotri"; [senator_leahy@leahy.senate.gov](#); [rich@oswegocounty.com](#); [barclaw@assembly.state.ny.us](#); "Holden, Tammy"; "Lyon, Jill"; [Michael.GaffneySr@pseg.com](#); "Turkal, Mark"; [dbenyak@firstenergycorp.com](#); [Boska, John](#); [senator_leahy@leahy.senate.gov](#)
Subject: Solicitation of Comments on Draft Guidance Documents Regarding Post-Fukushima Requirements
Date: Thursday, June 07, 2012 10:59:40 PM

Good morning,

Well, I tried to make comments based on announcement OPA No. 12-064. I guess it was my mistake to expect urgency: that the comments would be taken right away. So I reread the announcement and guessed that "no later than June 7" actually meant not before June 7, 2012. I waited and, this morning, I finally took the link from the announcement and found that, (probably to no great surprise to me), comments were not being accepted.

Hey, things can happen. So I called the OPA office at about 8:94 am this morning using 1-301-415-8200. They were, after all, the only reference on the two page announcement (even though the Lessons Learned Directorate has 20 or so full time employees assigned). I explained the problem. I was told that, unfortunately, OPA was a little shorthanded today since everybody was at meetings. Hey, I said, no problem, just send me over to one of those taxpayer provided cell telephones everybody has. Well, it turns out that just a few actually have (government provided) cell telephones. (And it really didn't matter to me because I wasn't going to any of them.) I was told: just a minute, then I noticed I was on hold, and then I noticed I was disconnected.

Silence.

You are probably waiting to hear that the person responsible for inadvertently disconnecting the line would have caller ID and would call me back. Nope: didn't happen.

But, I did send out an e-mail asking about the same problem.

So, hoping that, surreptitiously, the problem was fixed, after supper tonight, I again went to make those comments. And eventually, I was able to type in the second docket number, (since I was interested in commenting on the second order presented in the announcement), and actually, again, not to my surprise, find that the docket numbers and the orders were not presented in the same order in the announcement. So I tried them all and finally got to make my comments.

Oh, I didn't mention, I did not get any response from the e-mail I sent either.

Based on my experience today, how would you rate the United States Nuclear Regulatory Commission?

Thank you,

Thomas Gurdziel

From: suwamino@nifty.com
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";
Date: Saturday, June 09, 2012 9:06:46 PM

Below is the result of your feedback form. It was submitted by

(suwamino@nifty.com) on Saturday, June 09, 2012 at 21:06:58

comments: I, a Japanese, would like to send you my sincere request on the issue of the restart of nuclear power plant in Japan.

Two days ago, Prime Minister of Japan, Noda, announced the restart of nuclear power plant.

I strongly hope that the US Government pushes Japan to give up the restart, because, 1) the causes of Fukushima Daiichi disaster have not yet been specified at all and 2) safety measures for the restart are not prepared at all.

If another nuclear accident occurs again, other countries in the world including the USA will certainly and severely suffered.

Unfortunately, the Government of Japan is completely incapable to make reasonable and logically correct decision on this nuclear issues.

I believe that the US Government can only change the unreasonable decision of our Prime Minister Noda.

Please take urgent measures to save world.

name: SUWA Minoru

organization:

address1:

address2:

city: Tokyo

state: ---

zip:

country: Japan

phone:

From: [HEYMER, Adrian](#)
To: [JLD Public Resource](#)
Subject: FW: Comments on NRC Tier 3 Recommendations on Lessons Learned from the Accidents at Fukushima Daiichi Nuclear Power Plant in Japan Containment Vents
Date: Sunday, June 10, 2012 2:23:41 PM
Attachments: [06-08-12 NRC Comments on NRC Tier 3 Recommendations.pdf](#)
[06-08-12 NRC Comments on NRC Tier 3 Recommendations Attachment.pdf](#)

From: HEYMER, Adrian
Sent: Friday, June 08, 2012 6:18 PM
Subject: Comments on NRC Tier 3 Recommendations on Lessons Learned from the Accidents at Fukushima Daiichi Nuclear Power Plant in Japan Containment Vents

The attachment contains complete contents of the letter.

June 8, 2012

Mr. David L. Skeen
Director
Japan Lessons Learned Project Directorate
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on NRC Tier 3 Recommendations on Lessons Learned from the Accidents at Fukushima Daiichi Nuclear Power Plant in Japan Containment Vents

Project Code: 689

Dear Mr. Skeen:

The Nuclear Energy Institute (NEI) appreciates the opportunity to provide comments on the Nuclear Regulatory Commission's Tier 3 recommendations on the lessons learned from the reactor accidents at the Fukushima Dai-ichi nuclear power station in Japan.

General Comments

The NRC appropriately prioritized the recommendations of the NRC Fukushima Near-Term Task Force, the NRC Advisory Committee on Reactor Safeguards and members of the public. The industry agrees with the items that the NRC determined should be pursued without delay, categorized as Tier 1. Preliminary industry assessments indicate that the Tier 1 items, when completed, will achieve as much as 90 percent of the safety benefit from all recommendations.

At this time, the safety benefits derived from proceeding with implementation of the Tier 2

or Tier 3 recommendations are unclear. The implementation of Tier 1 items may address Tier 2 or Tier 3 issues. Once the path forward on the Tier 1 items is clear and implementation plans have been approved, better assessments of the benefits of proceeding with Tier 2 and Tier 3 can be made. At that time, the safety benefits of Tier 1 will be known and the significance of the Tier 2 and Tier 3 actions can be better assessed.

Adrian P. Heymer
Executive Director, Fukushima Response Coordination & Strategy

Nuclear Energy Institute
1776 I Street NW, Suite 400
Washington, DC 20006
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Sent through mail.messaging.microsoft.com

From: wonderfulhands@sbcglobal.net
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident;
Date: Sunday, June 10, 2012 6:18:29 PM

Below is the result of your feedback form. It was submitted by
(wonderfulhands@sbcglobal.net) on Sunday, June 10, 2012 at 18:18:44

comments: Fukushima Dai-ichi fallout in Pacific Ocean:
What is being done to clean up this sixX
Chernobyl disaster which has poisoned our
ocean and our coastline forever and how are
you making Japan's nuclear
industry/government to pay for it all? I am
dismayed at the scope of this environmental
disaster and will not simply stick my head in
the sand. When will you people learn that this
technology is not safe? How many more
disasters will it take?

name: Forrest Cottrell

organization: 171 Cohasset Lane

address1:

address2:

city: Chico

state: CA

zip: 95926

country: USA

phone:

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; [Screnci, Diane](#); "[Vanags, Uldis](#)"; P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); "[Newal Agnihotri](#)"; "[Tom Henry](#)"; "[Lyon, Jill](#)"; "[Holden, Tammy](#)"
Subject: Fukushima-related Comments for 6-11-2012
Date: Monday, June 11, 2012 8:24:27 AM

Good morning,

15 Month Status Report

Short term, long term, near term, far term....after 15 months, does it matter what words are used? I don't think words are as important as progress. So, where are we?

Unloading BWR elevated spent fuel pools

We need to be able to act quickly to remove all fuel (and other items) that are in the elevated spent fuel pool of an accident-damaged BWR plant.

Action taken to date: None

Storing the removed fuel pool items

We need an (already constructed) off-site place to store the removed fuel, at least for an intermediate time period.

Action taken to date: None

Finding the reactor core

We need to have equipment available to go into the reactor building and primary containment to locate all corium deposits (shortly after an accident.)

Action taken to date: Unknown

Providing Off (multi-plant) site AC Electric power

We need to determine which U.S. multi-plant sites have inadequate offsite power when all site plants need off site power at the same time.

Action taken to date: None

Dose Reduction to the General Public and the Environment

We need a PRA to determine if initial accident venting of the BWR Mk I and BWR Mk II primary containments will preserve their long term structural integrity so that they can be flooded up (without leaks) and thus the overall dose to the public is reduced.

Action taken to date: Unknown

(Did you notice that each item above is or would be applicable to U.S. plants?)

So, where do you think we are?

Thank you,

Tom Gurdziel

From: edgreisch@gmail.com
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident;
Date: Tuesday, June 12, 2012 12:46:58 AM

Below is the result of your feedback form. It was submitted by
(edgreisch@gmail.com) on Tuesday, June 12, 2012 at 00:47:13

comments: 573 certified deaths were due to evacuation-related stress at Fukushima. Zero due to radiation. February 4, 2012
<http://www.beyondnuclear.org/home/2012/2/4/japanese-authorities-recognize-573-deaths-related-to-fukushi.html>

"Japanese authorities recognize 573 deaths related to Fukushima Daiichi Nuclear Catastrophe
As reported by the Yomiuri Shimbun:
"A total of 573 deaths have been certified as "disaster-related" by 13 municipalities affected by the crisis at the crippled Fukushima No. 1 nuclear power plant....
A disaster-related death certificate is issued when a death is not directly caused by a tragedy, but by fatigue or the aggravation of a chronic disease due to the disaster.""

Fukushima: ZERO deaths were caused by radiation. 573 deaths were caused by the evacuation that was forced by officials. The people who died were evacuated from such things as intensive care. They might have survived if the evacuation had not taken place. Fukushima's natural background radiation is still higher than the radiation from the reactor leak. Fukushima's natural background radiation plus the radiation from the reactor leak is still less than the natural background radiation here in Illinois. Natural background radiation varies greatly from place to place. Our background radiation is around 350 milli rem/year.
"milli" means ".001"
350 milli rem/year means 0.350 rem/year
People living in Ramsar, Iran have a background radiation of 10 to 20 rems/year and report no ill effects.
just for your info

name: Edward Greisch

organization:

address1: 5213 12th Ave

address2:

city: Moline

state: IL

zip: 61265-2849

country: United States

phone: 3097645131

From: homeenergyexpert@hotmail.com
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";
Date: Wednesday, June 13, 2012 4:39:38 PM

Below is the result of your feedback form. It was submitted by
(homeenergyexpert@hotmail.com) on Wednesday, June 13, 2012 at 16:39:57

comments: As you are aware the mega disaster continues at Fukushima, where radiation levels are preventing humans and existing robots from working at Reactors #1,2, and 3. The University of Utah & a Utah start-up company have experts that have developed new technology that can assist in this fight to prevent the death's of millions of Japanese and others in the United States of America.

I urgently request your assistance with developing contacts to transfer this technology to Japanese robot manufacturers, and to the workers who will most certainly die without added body radiation protection.

When the predicted 2012 R-7.0 Earthquake occurs, these heroes will go into the lethal radioactive cloud to spray down the exposed fuel rods with water and a concrete mix. It is then that they will need the Utah start-up companies radiation body shielding compound. If the University of Utah's professor's new mechanical radiation robot shielding device can be deployed, both can be assisting in this life saving endeavour.

Sincerely,

James A. Knieling
702-218-6039

homeenergyexpert@hotmail.com

name: JAMES KNIELING

organization: Home Energy Expert Design, Auditing & Testing Serv

address1: 9405 S. EASTERN AVE APT 1040

address2:

city: LAS VEGAS

state: NV

zip: 89123

country: United States

phone: 7022186039

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; [Screnci, Diane](#); "[Vanags, Uldis](#)"; P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); "[Newal Agnihotri](#)"; "[Tom Henry](#)"
Subject: Fukushima-related Comments for 6-13-2012
Date: Wednesday, June 13, 2012 10:11:57 PM
Attachments: [P1020575.JPG](#)
[P1020577.JPG](#)

Good morning,

"U" Shaped Structures

Apparently the present water level in the torus chamber (of Fukushima Daiichi Units 2 & 3 (?)) is higher than the leaks, making the identification of their location not very feasible.

So what? Forget about them. The goal is to be able to raise water level to cover likely locations of corium. (In my mind this is, (at least initially), about 4 feet above the floor level under the reactor vessel.)

Call in some good soils engineering/foundation consultants and have them design you a "U" shaped structure using the present reactor building walls and adding height and thickness to them as needed. Additionally, and something that may have already been done, the reactor building perimeter drain system probably will need to be turned off. This will allow some balancing of hydrostatic pressure inside the reactor building with groundwater hydrostatic pressure outside.

("U" shaped structures are more commonly identified as canal locks or drydocks.)

Once the walls have been strengthened, add water to raise the level.

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; [Screnci, Diane](#); "[Vanags, Uldis](#)"; P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); "[Newal Agnihotri](#)"; "[Tom Henry](#)"
Subject: Fukushima-related Comments for 6-14-2012
Date: Thursday, June 14, 2012 10:18:48 PM

Good morning,

Intermediate Term Efforts

Since more time has elapsed that I am comfortable calling "near-term", it appears we have entered the next phase of action.

What are the items to be studied over the Intermediate Term? What are their scheduled completion dates?

For instance, will multiple (shock) impacts from multiple tsunami waves be looked at now? What about the possibility of heavy fuel oil tanks, (debris), floating around the site (and blocking building access)?

Or, will a PRA Level 3 be done to show any change in risk between a nearly fully loaded elevated BWR spent fuel pool and one mostly unloaded, (both with and without safety-related level instrumentation)? Or, is the PRA method not applicable to this type of study?

Also, it would be nice to have an actual list of all the reasons for each of the "Lessons we have learned" so far. If not done already, I feel it should be an Intermediate Term action item.

Thank you,

Tom Gurdziel

From: [Edwin Lyman](#)
To: [JLD Public Resource](#)
Cc: [Monninger, John](#); [Dave Lochbaum](#)
Subject: Supplemental UCS comments on Tier 3 recommendation for spent fuel transfer to dry casks
Date: Friday, June 15, 2012 3:50:10 PM
Attachments: [Tier 3 comments 6 15 12.docx](#)

Thank you for consideration of these comments.

Edwin Lyman
Senior Scientist
Union of Concerned Scientists
elyman@ucsusa.org

From: [Stuart Edwards](#)
To: [JLD_Public_Resource](#)
Subject: RE: Response from "Contact Us about Public Meetings on Nuclear Security and Safeguards;
Date: Friday, June 15, 2012 11:39:40 PM

Thank you for the contact details for Masaomi Koyama.

I understand that you are a United States agency and not responsible for radioactive waste from Japan.

However the reason I contacted your agency is because the evidence would indicate that the United States has been impacted as a result of radioactive material from Japan and since one of the areas of responsibility for your agency includes radioactive material safety and in particular to 'ensure protection of public health and safety' I am sure you can understand why I believe that your agency could become involved in management of the problem and minimization of the safety risks associated with the situation.

For your consideration.

Sincerely
Stuart Edwards

From: JLD_Public Resource [mailto:JLD_Public.Resource@nrc.gov]
Sent: Wednesday, 13 June 2012 2:27 AM
To: stuartedwards001@gmail.com
Subject: RE: Response from "Contact Us about Public Meetings on Nuclear Security and Safeguards;

Dear Sir,

Thank you for contacting the United States Nuclear Regulatory Commission (USNRC). As the USNRC is a United States of America Government Agency, we are not responsible for the disposal of radioactive waste from the country of Japan. We can suggest that perhaps you, or your government representatives, would like to contact the Government of Japan to inquire further about their strategy to handle radioactive waste from Fukushima Daiichi. An individual who may be able to help you with your inquiry is Masaomi Koyama, Principal Director, International Affairs, Nuclear and Industrial Safety Agency and he can be reached by electronic mail at Koyama-Masaomi@meiji.go.jp.

Thank you.

-----Original Message-----

From: stuart edwards [<mailto:stuartedwards001@gmail.com>]
Sent: Monday, June 04, 2012 10:23 AM

To: NSIR_WebServices Resource
Subject: Response from "Contact Us about Public Meetings on Nuclear Security and Safeguards";

Below is the result of your feedback form. It was submitted by

stuart edwards (stuartedwards001@gmail.com) on Monday, June 04, 2012 at 10:23:00

comments: Dear NRC

I recently heard that a disposal solution is urgently required for waste from Fukushima and I have recently contacted the Ministers in the Australian Northern Territory that provides perhaps a suitable construction of a waste storage facility and decided to contact your organisation as I heard that you have a fund available and could also provide use of some of your best practice technologies so it could be a win-win for Australia and the Northern Territory, possibly utilising American technology which will also provide a better alternative than the current disposal practices for Japan and the wider region.

I have recently contacted the NT Chief Minister about offering to utilise some of the remote uninhabited location within the NT – they have also recently passed enabling legislation for nuclear waste storage and also represents an economic development opportunity.

The contact details for the NT Ministers are available here

<http://www.nt.gov.au/ntg/chiefmin.shtml>

For your consideration

Regards

Stuart Edwards

organization:

address1: perth

address2: western australia

city: perth

state: WA

zip: 6165

country: australia

phone: 0417420653

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "Vanags, Uldis"; [Screnci, Diane](#); P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); "Newal Agnihotri"; "Tom Henry"
Subject: Fukushima-related Comments for 6-19-2012
Date: Tuesday, June 19, 2012 9:43:30 PM

Good morning,

What ever happened to PRA?

About 20 years ago, I and a lot of other people in the nuclear industry were introduced to the idea of Probabilistic Risk Assessment. One benefit of using it was to be able to calculate "risk" and end up with a number. A following benefit would be the ability to compare the numbers and see which plants were "better" and which were not.

Has this comparison been done with the Fukushima-Daiichi destroyed units and similar U.S. plants? In particular, if their numbers were equal or better than our plants, wouldn't it make sense to put a good bit of effort into improving our plants?

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: "[Vanags, Uldis](#)"; Bridget.Frymire@dps.ny.gov
Cc: [CHAIRMAN_Resource](#); hillsc@INPO.org; [Screnci, Diane](#); P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD_Public_Resource](#); "[Newal Agnihotri](#)"; "[Tom Henry](#)"; ESTRONSKI@aol.com; [Bowman, Gregory](#)
Subject: Using Truncation in PRAs
Date: Wednesday, June 20, 2012 10:35:59 PM

Good morning,

Yesterday I wrote a comment about Probabilistic Risk Assessments, or PRAs. Although at a low level, I worked on two, putting together fault trees for plant systems. Here are a few comments based on my observations and experiences from that time.

I don't know who decided it might be useful to be able to calculate the likelihood of success but I first came in contact with this idea in the latter part of the 1980s when INPO had developed a pilot success-oriented computer program named "GO". I believe that it soon became apparent that something was missing with "success" logic. And, although I don't remember specifically, I believe that the problem is that it ignores failure that would prevent the calculated success.

So, we moved to fault-based logic and used fault trees. The Level I PRA uses a bunch of fault trees (for a bunch of plant systems including the very important "support" systems), (for this we used "CAFTA"), and, somehow, a bunch of possible events, (for this we used "RISKMAN"). Next, these results were fed into more analysis (making it a Level II PRA). (I did no work on the Level II part.)

At this point, and I may be wrong, I believe you end up with one number. And I think that one number tells you how likely the plant systems and the plant containment would be able to survive those events THAT (only) HAVE BEEN STUDIED.

O.K., with this uncertain description I can now explain the effect of "truncation" (as I remember it.)

Let us use flooding. Suppose one of the events studied was a 3 foot flood at the plant. Maybe you would use a number of 1×10 minus 5 to estimate its chance of occurrence. Next, how about a 5 foot flood? Maybe its chance of occurrence is 1×10 minus 7. And, perhaps you look at a flood of 8 feet with a chance of occurrence of 1×10 minus 9. (Now watch this.) Since we have already established that anything with a chance of occurrence of 1×10 minus 8 is extremely unlikely, we truncate there.

This means your 8 foot flood just disappeared!

So, here is the point. When anybody is trying to impress you with their PRA work, make sure you find out at what level their truncation was performed. Then compare it with the number for, say, the earthquake and tsunami waves, (plural), at Fukushima Daiichi.

If the Fukushima Daiichi number is lower than the truncation number used for any U.S. nuclear plant PRA, they would not have included an event of such seriousness in their analysis, either.

Thank you,

Tom

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "[Vanags, Uldis](#)"; [Screnci, Diane](#); P.Kaiser@iaea.org; [JLD Public Resource](#); jicc@ws.mofa.go.jp; "[Newal Agnihotri](#)"; "[Tom Henry](#)"; ESTRONSKI@aol.com
Subject: Fukushima-related Comments for 6-22-2012
Date: Friday, June 22, 2012 8:28:53 AM

Good morning,

Building Foundation Water Problems

Did I read correctly last night that water from a recent typhoon has entered the basement of both Unit 5 and Unit 6 at Fukushima-Daiichi? If the foundation walls are not cracked and if the perimeter drain systems around each building are working, I wouldn't expect such a problem. Or if they are cracked and if building systems at Unit 5 and Unit 6 are not working, wouldn't it be informative if the general public was so informed?

And, let's face it: when I was in Vietnam in 1968 at Dong Ha (with the U.S. Navy "Seabees"), we got 24.0 inches of rain in 25 hours once. So, getting large amounts of rainfall in that part of the world should be no surprise.

It would seem that a likely conclusion is that, apparently, all of the Fukushima-Daiichi units were structurally damaged by the earthquake that caused the tsunami on March 11, 2011. At units 1 – 4, no inspection was done due to high radiation fields. What is the reason for no publically reported building inspection reports for units 5 and 6?

Additional Problem

I also read last night that the spent fuel that will be removed from Unit 4 will be placed in another spent fuel pool on site. Well, with Units 1 – 3 destroyed, all that leaves for the Unit 4 fuel would be Unit 5 or Unit 6. Does it make sense to you that spent fuel from one damaged and elevated spent fuel pool would be moved into an uninspected and elevated spent fuel pool?

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "[Vanags, Uldis](#)"; [Screnci, Diane](#); P.Kaiser@iaea.org; [JLD Public Resource](#); jicc@ws.mofa.go.jp; "[Newal Agnihotri](#)"; "[Tom Henry](#)"; ESTRONSKI@aol.com
Subject: Fukushima-related Comments for 6-23-2012
Date: Saturday, June 23, 2012 11:19:49 PM

Good morning,

Destination

I am of the opinion that spent fuel unloaded from the Fukushima Daiichi Unit 4 spent fuel pool should be immediately sent to the Fukushima Daini site about 7 miles away to be then loaded into Dry Storage Casks and stored at that site. This would use (off-site) people. They probably already have experience doing this sort of thing, and they have a lower contaminated and lower dose rate area.

Decontamination and Immediate Decommissioning

With no nuclear fuel in the reactor vessel, it is, in my opinion, time to remove the LPRM "strings", (long thin tubes), from the Unit 4 reactor vessel and start decontaminating various, no-longer needed systems, floors, and rooms. I do not see a reason to prevent this from starting before all fuel bundles (and other items) are completely removed from the Unit 4 spent fuel pool. (I note that I have read that no fuel in the Unit 4 spent fuel pool is damaged.)

Distractions

Discussing, (now), if the former Prime Minister disrupted anything (in one hour) by taking a helicopter ride to the site (when no credible information was being provided to him) is a big waste of time and a giant distraction. What needs to be done right now is to figure out what current decisions need to be made, when they need to be made, and what individuals must make these decisions. Then watch that they actually get made.

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: ["Newal Agnihotri"](#)
Cc: john.mageski@siempelkamp.com; hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; ["Vanags. Uldis"](#); [Screnci. Diane](#); P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); ["Tom Henry"](#)
Subject: Recycling
Date: Monday, June 25, 2012 10:19:17 PM

Good morning Newal,

Thank you for the May-June 2012 issue of "Nuclear Plant Journal". I found the information on the Siempelkamp Nukleartechnik company, (at the bottom left of page 15), particularly interesting. If the casks that they manufacture can hold spent fuel, it would seem useful to consider building them with (recycled) steel from destroyed buildings at Fukushima Daiichi.

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "[Vanags, Uldis](#)"; [Screnci, Diane](#); P.Kaiser@iaea.org; [JLD Public Resource](#); jicc@ws.mofa.go.jp; "[Newal Agnihotri](#)"; "[Tom Henry](#)"
Subject: Fukushima-related Comments for 6-25-2012
Date: Monday, June 25, 2012 10:56:59 PM

Good morning,

I see that a couple of nuclear plants will be starting up pretty soon. Perhaps I just missed it but two or three things do not appear to have been addressed (and publically reported) that I consider important.

Operator Training

INPO Report 11-005 on page 62 states that the operating crew gets 10 days of training after every 5th rotation. If you go to the top part of page 64 though, you will see that operators receive approximately 80 hours of training per year. Then, if you add up the training that non-supervisors receive, I find it to add up to just 51 hours per year. I consider this inadequate.

Crew Size/Organization

On page 62 you will read that one operating crew is responsible for two units. I don't like this and I think it is costly to plant safety when accidents occur.

Restoration of Off-site AC Power

The restoration logic used to repair the loss of off-site AC power to Fukushima Daiichi provided these results: for Unit 1 it took nine days to get power to a nuclear plant having an accident. For Unit 2 it also took nine days. However, for Unit 3 it took eleven days. (INPO Report 11-005, pages 21, 28, and 33) At Fukushima Daini they apparently restored the lost off-site electric power before any reactor core was damaged. Has anybody studied the repair reasoning used at both sites and taken any corrective actions from any lessons that may have been learned?

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: [hillsc@INPO.org](#); [Bridget.Frymire@dps.ny.gov](#); "[Vanags, Uldis](#)"; [Screnci, Diane](#); [P.Kaiser@iaea.org](#); [JLD Public Resource](#); [jicc@ws.mofa.go.jp](#); "[Newal Agnihotri](#)"; "[Tom Henry](#)"
Subject: Fukushima-related Comments for 6-26-2012
Date: Tuesday, June 26, 2012 9:56:46 PM

Good morning,

Here are more comments related to starting up non-Fukushima Daiichi nuclear plants.

AC Power Feeds to Emergency Powerboards

Did you look closely at the electric power feeds to the emergency powerboards (for Unit 1 through Unit 4) shown in the INPO report? As I recall, circuit breaker switching is required each time a main generator trips. Why is this? If the offsite supply point is placed beyond the main generator output circuit breaker, power from the transmission line would still be continuously present. This means a reduced chance of loss of power to the emergency powerboards.

Plants with emergency powerboard feeds similar to those at Fukushima Daiichi have higher risk than they need to have.

Emergency Diesel Generator Cooling Water Pump Motors

Are all motors for emergency diesel generator cooling pumps still mounted above wharf level, out in the open? If so, wouldn't it make sense to replace half of them with submersible pump/motors? This way floodwater height doesn't matter.

Reactor Vessel 100 degree/hour Cooldown Rate

Has it been determined why a 100 degree/hour cooldown rate must be respected during accident conditions? Do the words "irrespective of cooldown rate" appear anywhere in present Emergency Operating Procedures?

Hardened Vents

Do rupture disks still have a rupture pressure higher than primary containment pressure? Are any valves throttled to be only 10 or 15% (instead of full) open?

Emergency Condensers

If the plant contains Emergency Condensers, has their operation (and value as a Passive System) been thoroughly explained to station (and higher) management?

Reactor Internals Storage Pit

Has consideration been given to keeping the reactor internals storage pit full of water during plant operation as an additional, on-site source of water?

Harbor Walls/Breakwaters

Are defenses against tsunami heights also expected to be able to resist each following tsunami wave? In other words, are the defenses good only for the first wave?

Emergency Power Elevations

Have emergency powerboards (and DC batteries) been moved to diverse elevations?

Spent Fuel Pool

How many bundles of spent fuel are in the spent fuel pool but no longer need to be there?

Blow out Panels

Have the size of turbine and reactor building blow out panels been checked for appropriate size?
(Panels must be big enough; bolts must be small enough.)

Separate Control Rooms

Does each generating unit have its own Control Room? (I don't like one control room for two operating units during a multi-plant accident.)

Stress Test Results

How much better are the stress test results for each unit to be started up when compared with stress tests for Fukushima Daiichi Units 1, 2, 3, and 4?

List of Physical Changes

Provide a list of physical changes to the plant made as a result of learning lessons from Fukushima Daiichi?

Thank you,

Tom Gurdziel

From: Kratchman, Jessica
To: [JLD Public Resource](#)
Subject: FW: Some questions on NTTF implementation guide
Date: Wednesday, June 27, 2012 8:33:19 AM

From: [mailto:u806190@taipower.com.tw]
Sent: Wednesday, June 27, 2012 4:32 AM
To: Kratchman, Jessica
Subject: Some questions on NTTF implementation guide

Dear Jessica,

Can you pass the following questions to the right person and wrap-up the answers for me?

1.About NTTF 2.3 seismic and flooding walkdown procedure,I learned from ADAMS system that there is only one seismic walkdown procedure(Draft 0) but no flooding walkdown procedure.Since NRC expressed in the 3/12/12 50.54(f)letter that it will endorse the walkdown procedure before utility perform the related walkdown activity and our regulatory agency(ROCAEC) is pushing Taipower to do the seismic and flooding walkdown,I want to know the most updated status for those two walkdown procedure,including its new version and NRC endorsement.Or NRC expects utility utilizing NEI 12-07 flooding walkdown guide to perform the flooding walkdown instead of issuing another flooding walkdown procedure?

2.About NTTF 4.2,Is NRC going to endorse NEI-12-06:Diverse and Flexible Coping Strategies Implementation Guide? What is the most updated status?

3.About NTTF 7.1,Is NRC going to endorse NEI-12-02:Industry Guidance for Compliance with NRC Order EA-12-051 “To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation”?What is the most updated status?

4.There are two Draft ISG for above mentioned NTTF

4.2&7.1:JLD-ISG-2012-01&JLD-ISG-2012-03,What is the role of those materials on the industry's implementation for NTTF 4.2&7.1?

5.About NTTF 5.1 hardened containment vent,There is no such guidance as NEI 12-06 for NTTF 4.2,but only Draft ISG JLD-ISG-2012-02 "Compliance with Order EA-12-050,Reliable Hardened Containment Vents".Dose NRC expects utility utilizing the content of that ISG to perform the related modification activity for Hardened Containment Vents instead of issuing another NEI document for utility use?

I hope not bothering you too much and thank you for your help in advance.

Sincerely yours,

**Kuo-Liang Tsai
Senior Engineer
Department of Nuclear Safety
Taiwan Power Company**

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hills@INPO.org; Bridget.Frymire@dps.ny.gov; "[Vanags, Uldis](#)"; [Screnci, Diane](#); P.Kaiser@iaea.org; [JLD Public Resource](#); jicc@ws.mofa.go.jp; "[Newal Agnihotri](#)"; "[Tom Henry](#)"
Subject: Fukushima-related Comments for 6-28-2012
Date: Thursday, June 28, 2012 9:54:06 PM

Good morning,

An explosion destroyed a nuclear plant. A large amount of anxiety resulted over whether or not the spent fuel actually had been covered with water. And, for reasons not stated (to date), the spent fuel pool needed to be shored up. Later, a statement was issued that said that the Fukushima Daiichi Unit 4 spent fuel was undamaged.

Now I am reading that only two fuel bundles will be removed next month and that they will be inspected for damage.

Did something change? What caused the possibility of damage? But, more importantly, even if some (or even all) of the spent fuel is damaged, why does anybody feel that it is safer to not remove it as fast as humanly possible?

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "[Vanags, Uldis](#)"; [Screnci, Diane](#); P.Kaiser@iaea.org; [JLD Public Resource](#); jicc@ws.mofa.go.jp; "[Newal Agnihotri](#)"; "[Tom Henry](#)"; ESTRONSKI@aol.com
Subject: Fukushima-related Comments for 7-2-2012
Date: Monday, July 02, 2012 9:44:15 PM

Good morning,

Earthquake Damage

I believe it is time to seriously determine how much earthquake damage actually did occur at the Fukushima Daiichi site on March 11, 2011. I have seen at least one report of no earthquake damage. And, until now, I have pretty much accepted it, even though I have also seen a report that inspections were not done to determine how much, (if any), earthquake damage occurred on that site.

The recent report of a very significant radiation reading at Fukushima Daiichi Unit 1 seems, to me, to support a hypothesis of an immediate and large loss of coolant accident at Unit 1 (due to the earthquake). I believe the resulting loss of reactor level, (at LoLo (??)) would isolate the emergency condenser(s) by shutting valves. As you may be aware, the unexpected closed position of emergency condenser valves has not been explained (to date). And, the isolation of the emergency condensers would explain why very little shell side cooling water boiled off (into the outside environment).

Rather than just assuming that no earthquake-caused damage occurred, doesn't it make sense to actually look for damage?

Elevated Spent Fuel Pool Water Level & Cooling

With a couple of recent reported interruptions to the Fukushima Daiichi Unit 4 Spent Fuel Pool cooling, attention has been drawn away from the Unit 1, Unit 2, and Unit 3 elevated spent fuel pools.

Do they each have the intended amount of water and are they each getting continuous cooling?

Thank you,

Tom Gurdziel

From: [Virginia Dato](#)
To: [JLD Public Resource](#)
Cc: [Erica Frank, MD, MPH](#)
Subject: Re: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";
Date: Saturday, July 07, 2012 8:04:54 AM

Dear Japan Lessons Learned Project Directorate.
Dr. Frank sent the following email on behalf of AAPHP and other organizations. I believe there is at least one more group that is signing on. It is my hope that this will help you as you work to ensure safety for American citizens and learn lessons from the accident in Japan.

Sincerely,
Virginia Dato MD MPH
President
AAPHP

From: Erica Frank, MD, MPH
Date: Tuesday, July 3, 2012
Subject: Official request for radiation monitoring of Pacific-harvested foods
To: Steven Wilson Chief Quality Officer NOAA Seafood Inspection Program <steven.wilson@noaa.gov>, "Eric Staiger (NOAA Chief Western Inspection)" <eric.staiger@noaa.gov>, Art Liang CDC Food Safety <arthur.liang@cdc.hhs.gov>, aliang@cdc.gov, Susan Lance CDC FDA Liaison <sel0@cdc.gov>, Andrew Maccabe FDA liaison <andrew.maccabe@cdc.hhs.gov>, Murray Lumpkin FDA Deputy Commissioner for International Programs <murray.lumpkin@fda.hhs.gov>, Nega Beru Director FDA Center for Food Safety <nega.beru@fda.hhs.gov>, Phil Watney Program Manager BC Food Protection <finfo@bccdc.ca>, BC Food Safety Initiative <fsi@ssfpa.net>, BC Food Protection Association Pres Alex Montgomery <president@bcfpa.net>, David Butler-Jones Chief PH Officer for Canada <cpho-asp@phac-asp.gc.ca>, Deputy Minister for Health BC <hlth.doffice@gov.bc.ca>, robert brunham <Robert.brunham@bccdc.ca>, Bonnie Henry <bonnie.henry@bccdc.ca>, Judy Greig Food Safety Epidemiologist <Judy_Greig@phac-asp.gc.ca>, Minister DFO Hon Keith Ashfield <Min@dfo-mpo.gc.ca>, info@dfo-mpo.gc.ca, Erin Burns Flett Quality Manager DFO <Erin.Burns-Flett@dfo-mpo.gc.ca>, Robert Charlebois Food Safety <Robert.Charlebois@inspection.gc.ca>, Preston Chan Fish Product Specialist Western Programs <preston.chan@inspection.gc.ca>, Jeanelle Boudreau Western Fish Policy <jeanelle.boudreau@inspection.gc.ca>, Deirdre Kelly Western Fish Policy Officer <deirdre.kelly@inspection.gc.ca>, Catherine Mar Policy Officer for Western Region <catherine.mar@inspection.gc.ca>, info@fnhc.ca, L Wylie Senior Advisor Health Systems <lwylie@fnhc.ca>, Dr Sarah Williams Senior Advisor Health Services <swilliams@fnhc.ca>, June Halliday FNHDA Program and Policy Analyst <jhalliday@fnhc.ca>, Lori Sellars Health Planner Primary Care and Public Health <lsellars@fnhc.ca>, Health Canada Yasmin Yorish Food Safety Evaluator <yasmin.yorish@hc-sc.gc.ca>, Bureau of Food Safety <BFSA_BESA@hc-sc.gc.ca>, Brian Ahier Director Radiation Protection Bureau <rpb-bpr@hc-sc.gc.ca>, brian.ahier@hc-sc.gc.ca

From: The American Association of Public Health Physicians, Canadian Association of Physicians for the Environment, David Suzuki Foundation, International Society of Doctors for the Environment, Physicians for

Global Survival, Physicians for Social Responsibility (National Organization and Oregon Chapter).

To (Canadian): The B.C. Centre for Disease Control, Canadian Food Inspection Agency, Department of Fisheries and Oceans, First Nations Health Authority, Health Canada, and the Public Health Agency of Canada

To (U.S.): The Centers for Disease Control and Prevention, Food and Drug Administration, and the National Oceanic and Atmospheric Administration

We write to request the immediate creation and implementation of a government plan to monitor the radioactivity levels of edible species that could reasonably be exposed to radiation from the ongoing Fukushima disaster.

Our concern stems from the 2011 meltdown of the nuclear reactors in Fukushima Japan, with substantive and ongoing release into the Pacific Ocean of radioactively-contaminated sea water used to cool the cores. The April 2012 Congressional Research Service report "Effects of Radiation from Fukushima Dai-ichi on the U.S. Marine Environment" summarizes that: "Barring another unanticipated release, radioactive contaminants from Fukushima Dai-ichi should be sufficiently dispersed over time that they will not prove to be a serious health threat elsewhere, unless they bioaccumulate in migratory fish or find their way directly to another part of the world through food or other commercial products."

Despite this and other clear warnings (cited below), we have found no published federal plans to monitor the radioactive safety for consumption of Pacific migratory fish, nor any such plans to do so through discussions with FDA, CDC, or BCCDC. This is true even though we know that this is already an issue: every bluefin tuna caught off San Diego in a August 2011 study demonstrated elevated amounts of Cesium 134 and 137 (characteristic isotopes for Fukushima), and it is known that tuna and other edible fish regularly migrate through marine regions radioactively contaminated from Fukushima. Further, the North American fishing industry has stated publicly that they were promised by and are relying on the government to test Pacific salmon, especially given findings of radioactively contaminated waters and fish caught in them off Japan, and of continued contamination (e.g.: Tokyo Electric stating that 12 tons of water contaminated with radioactive Strontium leaked from the Fukushima site in April 2012).

Therefore, on behalf of our varied constituencies, we call on the organizations to whom this letter is addressed, and/or other appropriate North American federal agencies to investigate and

appropriately monitor radiation levels of foods harvested in the Pacific (from Japanese, North American, and other waters, if at risk) and sold in North America that could (based on current data) reasonably have been exposed to radiation from Fukushima, and promptly and fully release findings, together with information about any health implications of consuming these foods.

Sincerely yours,

Erica Frank, MD, MPH on behalf of the

American Association of Public Health Physicians, Canadian Association of Physicians for the Environment, David Suzuki Foundation, International Society of Doctors for the Environment, Physicians for Global Survival, and Physicians for Social Responsibility (National Organization and Oregon chapter).

References

Congressional Research Service <http://www.fas.org/sgp/crs/misc/R41751.pdf>

<http://www.pnas.org/content/109/24/9483.full.pdf+html>

<http://www.bbc.co.uk/news/science-environment-18239107>

http://www.nytimes.com/2011/03/22/science/earth/22food.html?_r=1

http://www.nytimes.com/2012/05/25/world/asia/radioactive-release-at-fukushima-plant-was-underestimated.html?_r=2

<http://www.straight.com/article-663186/vancouver/feds-not-testing-salmon-radiation>

http://pgs.ca/?page_id=4946

http://www.nytimes.com/2012/06/26/world/asia/fears-accompany-fishermen-in-japanese-disaster-region.html?_r=1&nl=today'sheadlines&emc=edit_th_20120626

<http://www.businessweek.com/news/2012-04-05/tepco-reports-another-radioactive-water-leak-at-fukushima-plant>

On Tue, Jun 26, 2012 at 10:28 AM, JLD_Public Resource

<JLD_Public.Resource@nrc.gov> wrote:

> Dr. Dato -

>

>

>

> Please be aware that we are still looking into your topic and hope to have a response to you soon.

>

>

>

> Japan Lessons Learned Project Directorate

>

> Office of Nuclear Reactor Regulation

>

> US Nuclear Regulatory Commission

>

>
>
> From: Virginia Dato [<mailto:vmdato@gmail.com>]
> Sent: Tuesday, June 05, 2012 8:21 AM
> To: JLD_Public Resource
> Cc: Arvind Goyal; Joe Murphy; Tim Barth; efrank3g@gmail.com
> Subject: Re: Response from "Contact Us about Actions in Response to the
> Japan Nuclear Accident;

>
>
>
> Dear Japan Lessons Learned Project Directorate

>
>
> We will be grateful for any assistance in finding the correct responsible
> competent agency for testing migratory fish for radiation. I am beginning
> to think that there might not be one. As I look at this website -which I
> don't believe has been updated since May 2011 -
> <http://www.fda.gov/newsevents/publichealthfocus/ucm247403.htm#sofar> it
> appears that the FDA has the expertise. However if they see their role as
> technically only testing imports than fish that swim and are caught here
> would not be under their jurisdiction. As a public health physician I
> would much prefer to know that an appropriate federal agency is quietly
> testing fish than for us to attempt to pass a resolution at the AMA where
> the press might misconstrue and over estimate the risk if any. I think the
> bottom line is that we really can't know what long distance migratory fish
> such as salmon and tuna are capable of bioaccumulating without testing. If
> the tests are low than that will be a wonderful lesson learned and if the
> tests are high I prefer to learn my lesson thorough testing than through an
> increase in cancer further down the road. If there is evidence that
> testing is not needed that that would be great, just let us know!.

>
> Thank you again for your patience and any assistance with this issue,

>
> Sincerely,

>
> Ginny

>
> Virginia Dato MD MPH FACPM FAAP

>
> President-Elect AAPHP

>
> aaphp.org

>
>
> On Mon, Jun 4, 2012 at 1:27 PM, Erica Frank, MD, MPH <efrank3g@gmail.com>
> wrote:

>
> Dr. Dato, our colleagues, and I thank you for your response. However, we
> are unable to identify anyone within EPA who would be appropriate to respond
> to this query -- who might you suggest?

>
>
>
> Gratefully,

>
> Erica

>

> Erica Frank, MD, MPH
>
> From: JLD_Public Resource <JLD_Public.Resource@nrc.gov>
>
>
> Date: June 4, 2012 7:35:33 AM EDT
> To: "vmdato@aaphp.org" <vmdato@aaphp.org>
> Subject: RE: Response from "Contact Us about Actions in Response to the
> Japan Nuclear Accident;
>
> Dr. Dato,
>
> The NRC does not perform or generally require environmental monitoring
> outside of licensee site boundaries. Please contact the US Environmental
> Protection Agency with your inquiry because this type of radioactivity
> monitoring is within their jurisdiction.
>
> Thank you for contacting the Japan Lessons Learned Project Directorate.
>
> Japan Lessons Learned Project Directorate
> Office of Nuclear Reactor Regulation
> US Nuclear Regulatory Commission
>
> -----Original Message-----
> From: vmdato@aaphp.org [<mailto:vmdato@aaphp.org>]
> Sent: Tuesday, May 29, 2012 7:36 AM
> To: JLD_Public Resource
> Subject: Response from "Contact Us about Actions in Response to the Japan
> Nuclear Accident;
>
> Below is the result of your feedback form. It was submitted by
>
> (vmdato@aaphp.org) on Tuesday, May 29, 2012 at 07:36:20
> -----
>
>
> comments: I am President Elect of the American
> Association of Public Health Physicians.
> (aaphp.org) One of our members has
> written the resolution below because of her
> concern about bioaccumulation of radiation
> in Salmon and other migratory fish. Are
> there any plans to monitor fish? If not, are
> we missing a key fact? Is there any reason
> not to submit this resolution and/or is there
> any way we can improve it. Thank you in
> advance for your assistance with this
> question and for your time, diligence and
> public service.
> Virginia Dato
>
> Title: Preventable potential cancer
> pandemic.
> Whereas the 2011 collapse of the nuclear
> reactor in Fukushima Japan created
> abundant radioactive overflow coolant water
> that was released into the Pacific Ocean;
> and
>
> Whereas the Summary of the April 2012

- > Congressional Research Service report
- > "Effects of Radiation from Fukushima Dai-ichi on the U.S. Marine Environment" states
- > that: "Barring another unanticipated release,
- > radioactive contaminants from Fukushima
- > Dai-ichi should be sufficiently dispersed
- > over time that they will not prove to be a
- > serious health threat elsewhere, unless they
- > bioaccumulate in migratory fish or find their
- > way directly to another part of the world
- > through food or other commercial products."

>

- > Whereas we find no published federal plans
- > to monitor Pacific Wild Salmon's radioactive
- > safety, nor any such plans through
- > discussions with FDA or CDC, although
- > Pacific Wild Salmon are clearly in a cohort
- > of fish that will have had the opportunity to
- > migrate through radioactive plumes and be
- > exposed to radioactive environments
- > (including prey) from Fukushima; therefore
- > be it

>

- > Resolved, that our AMA immediately
- > request the CDC, FDA, NOAA, and/or other
- > appropriate federal agencies to:
- > 1. investigate and appropriately monitor
- > radiation levels of foods harvested in the
- > Pacific (including migrating salmon), and
- > promptly and fully release findings, together
- > with information about any health
- > implications of consuming these foods; and
- > 2. encourage public policies that reduce the
- > risk of radioactive contamination of fish and
- > other commercial products.

>

> References

- > -Congressional Research Service
- > <http://www.fas.org/sgp/crs/misc/R41751.pdf>
- > - [http://www.straight.com/article-](http://www.straight.com/article-663186/vancouver/feds-not-testing-salmon-radiation)
- > 663186/vancouver/feds-not-testing-salmon-
- > radiation

> -

- > [http://www.nytimes.com/2012/05/25/world/a-](http://www.nytimes.com/2012/05/25/world/asia/radioactive-release-at-fukushima-plant-was-underestimated.html?_r=2)
- > sia/radioactive-release-at-fukushima-plant-
- > was-underestimated.html?_r=2

>

- > The justification for the delay is that the
- > importance of the problem was not clear
- > until the Congressional Research Service
- > piece in April 2012 and the May 25 2012
- > Reuters/NYTimes article on the upwards
- > revised estimates of dose, which stated "It
- > is difficult to judge the health effects of the
- > larger-than-reported release, since even the
- > latest number is an estimate, and it does
- > not clarify how much exposure people
- > received or continue to receive from
- > contaminated soil and food." We have the
- > chance, for the first time in history that I can

> think of, to completely prevent a human
> cancer pandemic, and to do so by just
> checking a few extra fish from the
> supermarkets near the Winchester
> Massachusetts FDA fish lab.
>
>
> name: Virginia Dato MD MPH FACPM FAAP
>
> organization: American Association of Public Health Physicians
>
> address1:
>
> address2:
>
> city:
>
> state: ---
>
> zip:
>
> country:
>
> phone: 4125135368
>
> -----
>
>
>
>

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: [hillsc@INPO.org](#); [Bridget.Frymire@dps.ny.gov](#); "Vanags, Uldis"; [Screnci, Diane](#); [P.Kaiser@iaea.org](#); [jicc@ws.mofa.go.jp](#); [JLD_Public_Resource](#); "Newal Agnihotri"; "Tom Henry"; [ESTRONSKI@aol.com](#); "Holden, Tammy"; "Lyon, Jill"; [Fukushima@bas.edu](#); [barclaw@assembly.state.ny.us](#); [rich@oswegocounty.com](#); [dbenyak@firstenergycorp.com](#); [senator_leahy@leahy.senate.gov](#); "Turkal, Mark"; [Michael.GaffneySr@pseg.com](#)
Subject: Fukushima-related Comments for 7-10-2012 16 Month Status
Date: Tuesday, July 10, 2012 10:10:55 PM

Good morning,

(U.S.) Regional Centers for Rapid Dispatch of Emergency Material

No Regional Center is in operation.

Locations for the Regional Centers have not been publically announced.

Lists of equipment and supplies to (eventually) be purchased for the Regional Centers have not been made public.

Adequacy of (U.S.) Multi-plant-site Offsite AC Power

Such studies have not been done.

Adequacy of (U.S.) Single-plant-site Offsite AC Power

Such studies have not been done.

Use of (U.S.) Common Facilities during Emergencies

Noting that a common control room was used at Fukushima Daiichi Units 1 and 2 and noting further that both reactor cores there have melted, has the use of a common control room at multiple plant sites during emergencies involving all plants on site been studied?

Such studies have not been done.

Noting that vent ductwork connections to a common stack appear to have enabled the destruction of the (non-operating) Fukushima Daiichi Unit 4 from the explosive gases of Unit 3, has the use of connected vent pathways been studied to determine previously unanticipated risk?

Unknown

Command & Control

Given that no direct chain of command appears to exist between shift supervision and any auxiliary operator at Fukushima-Daiichi Units 1 – 4 as shown on the page 62 chart of INPO Report 11-005, has the organizational structure of U.S. nuclear plants been reviewed for adequacy during multi-plant accidents?

Unknown

Workforce Size

Noting that the March 11, 2011 accident occurred on a weekday during ordinary working hours when a maximum of people were available on site, has the workforce size necessary for (U.S.) multi-plant accidents been compared with that available during the back shifts or on week ends?

Unknown

Hardened Vents

Given that it appears hardened vents were installed at the Fukushima Daiichi BWR Mk I plants but they were unable to reduce primary containment pressure sufficiently and quickly enough to save any reactor core, has a study been done to determine the likelihood of similar failure of U.S. BWR Mk I hardened vents to work as needed to prevent core melt?

No public report of such a study.

Earthquake, (U.S.)

Proposed efforts under discussion.

Flood, (U.S.)

Proposed efforts under discussion (but may overlook flood-water-carried debris impact.)

Final Disposal of Large Amounts of Spent Nuclear Fuel in (U.S.) BWR Elevated Pools

Proposed efforts under discussion are limited to pool instrumentation enhancements only.

Thank you,

Thomas Gurdziel
Member, ASME

Do you think the informed public would be comfortable with our progress to date?

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "Vanags, Uldis"; [Screnci, Diane](#); P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); "Newal Agnihotri"; "Tom Henry"
Subject: Fukushima-related Comments for 7-12-2012
Date: Thursday, July 12, 2012 9:57:52 PM

Good morning,

Is it History? Or is it Knowledge Transfer?

I started rereading NUREG/BR-0175, Rev 1 yesterday, ("A Short History of Nuclear Regulation, 1946 – 1999" by J. Samuel Walker), and found some very useful information in it relative to current nuclear industry problems.

Separation of the Regulation and Development/Promotion Functions

In approximately 1956, the staff of the Joint Committee on Atomic Energy prepared a study of the AEC "including consideration of whether regulatory and promotional responsibilities should be carried out by separate agencies." "The staff concluded that the creation of separate agencies was inadvisable at the time, principally because of the difficulty of recruiting qualified personnel for purely regulatory functions." (p. 13)

Chapter 1 provides me with an understanding of why we, (and the Japanese), did not initially separate these two functions. So, rather than saying: they should have known to (initially) separate those functions, we need to say something like: it has now become time to separate those functions.

Primary Containment: no longer a final defense

Just recently I have seen presented two ways to protect the public from a commercial nuclear plant accident. One way addresses keeping the reactor core from melting; the other addresses filtering out harmful (melted-core-related) material before its exit into the general environment. When I read them, I thought these two ideas made sense. However, I obtained a different view after reading Chapter 2. In it, I read (on page 28) that (1960s) experts were confident that the containment structure would prevent a massive release of radioactivity to the environment from "older and smaller reactors." "As proposed plants increased significantly in size, however, they began to worry that a core melt could lead to a breach of containment. This became their primary focus partly because of the greater decay heat the larger plants would produce and partly because nuclear vendors did not add to the size of containment buildings in corresponding proportions to the size of reactors." (p. 29)

So, 40 plus years later, this tells me that the option we have is: try better to save the reactor core because the (primary) containment will not remain intact. Wasn't this demonstrated at Fukushima Daiichi?

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: [hillsc@INPO.org](#); [Bridget.Frymire@dps.ny.gov](#); "[Vanags, Uldis](#)"; [Screnci, Diane](#); [P.Kaiser@iaea.org](#); [jicc@ws.mofa.go.jp](#); [JLD_Public_Resource](#); "[Newal Agnihotri](#)"; "[Tom Henry](#)"; [ESTRONSKI@aol.com](#); [rich@oswegocounty.com](#); [barclaw@assembly.state.ny.us](#); "[Holden, Tammy](#)"; "[Lyon, Jill](#)"
Subject: Fukushima-related Comments for 7-16-2012
Date: Monday, July 16, 2012 11:12:46 PM

Good morning,

Dishonest

I read a couple of things recently and I hope I misunderstand them. What I read was a comment that a mistake had been made on a couple of nuclear powerplant stress tests. And I read that earthquakes and tsunamis had not been included in some nuclear plant analyses. So, the fear is that stress tests have been done without considering effects due to earthquakes, tsunamis, or even both. Since I had expected the need for stress tests was specifically due to the earthquake and tsunami waves that hit Fukushima Daiichi, issuing statements saying all plants passed their stress tests (without pointing out that earthquakes and tsunamis were excluded) would be dishonest.

Startup Advice

There have also been some recent comments about whether approval by the local residents would be obtained to startup currently shutdown nuclear plants. Here is some of what I would be looking for if the three BWR plants about 7 miles from me were in that position.

First off, I would ask the plant owner to show me a (written) list of the lessons his organization had learned from the Fukushima Daiichi tragedy. Next, I would ask to see the organization's reasons why those lessons were important. Next, I would ask to see a list of all the completed, (not promised), changes made at each plant since March 11, 2011. Then, I would compare this information with a few things that I feel are mandatory for running a nuclear powerplant safely in 2012.

One would be a full scale model of the actual plant control room for the unit simulator. We usually refer to this as simulator "fidelity". If they don't have a very close-to-exact model for each plant unit, they are not ready to startup.

Another would be the configuration of the emergency power boards for each plant when it is running. If the plant takes a unit (generator) trip off line and ANY part of the power supply to every emergency power board has to change position, they are not ready.

Another would be the number of units run from each control room. If they plan to operate more than one plant (at a time) from any control room, they are not ready.

Another would be the "money-saving" cross connection of building ventilation systems. If they have any connections, they are not ready.

Another would be the elevated spent fuel pool (if the plant is a BWR). Do they have any spent (or "used") nuclear fuel in it that has been in it for 5 years or longer? If they do, they are not ready to start up.

Does the control room chain of command include direct control over ALL the operators out in the plant? If it does not, they are not ready.

I would have them demonstrate to at least one or two of my local government representatives that, when they run a diesel fire pump out of fuel, somebody on each shift can get it started again (right away).

If experienced (external or internal) effects are greater than expected, do they tell you that it exceeds their original design basis, but they have changed it to include the effect, plus a little extra. If they have, they are ready here. If they want you to “grandfather” their original design basis, they are not ready.

Do they have a restriction on reactor cooldown rate during accidents? If they do, they are NOT ready.

Does the current (not promised) regulatory authority have the responsibility to financially fine (or otherwise discipline) poor performers or do they use ADR, (Alternate Dispute Resolution)? If they use ADR, they are NOT ready.

But, these are just some of the concerns I would have. What is important is that the people local to the plant do their own thinking and make up their own minds.

Thank you,

Tom Gurdziel

Why are the acceptance criteria for the stress tests still kept secret from the public?

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "Vanags, Uldis"; [Screnci, Diane](#); P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); "Newal Agnihotri"; "Tom Henry"
Subject: Fukushima-related Comments for 7-19-2012
Date: Thursday, July 19, 2012 9:53:44 PM

Good morning,

Power Downrates

It is time to question the "what goes up never comes down" regulatory tradition in three cases: 1) predicted strong external events, 2) plant aging, and 3) bad performance.

Predicted Strong External Events

Suppose that you have a system in place to predict the occurrence of, (for instance), tsunami effects at a particular nuclear powerplant site in, say, a certain number of hours. Doesn't it make sense to reduce reactor power and maybe even start the, (or one of the), emergency AC power generators in advance of the event arrival?

Plant Aging

Seems that I remember hearing, probably at U.S. Navy Civil Engineer Corps Officers School in Port Hueneme, California in early 1967, that the U.S. Navy derated (at least mobile) cranes due to age alone. I am suggesting consideration of derating plants (in Japan) that get a license extension. Maybe extend for 5 years reduced to 90% and the next 5 years reduced to 75% to account for plant aging/plant aging unknowns.

Bad Performance

I am suggesting that the U.S. Nuclear Regulatory Commission Chairman and all four Commissioners consider plant derate as an enforcement option.

Thank you,

Tom Gurdziel

Yes, I have heard of "souping" in the exhaust systems of unloaded emergency diesel generators. Perhaps the industry should consider loading them with some plant (emergency) pumps when they are started up in advance of trouble.)

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "Vanags, Uldis"; Screnci.Diane; P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); "Newal Agnihotri"; "Tom Henry"; ESTRONSKI@aol.com; [Bowman, Gregory](#)
Subject: Fukushima-related Comments for 7-21-2012
Date: Saturday, July 21, 2012 8:23:46 AM

Good morning,

Financial Considerations

There are two financial considerations that I have seen no mention of in public news releases. I want to mention them today.

Nuclear Plant Liability Insurance Coverage

Given that, (based on Fukushima Daiichi), simultaneous multi plant accidents on one site will cost a lot of money, has anybody reviewed present U.S. nuclear plant coverage relative to adjusting plant fees or limits of coverage when all site plants are in operation at the same time, (as opposed to when only one at a time runs)?

The point here is that (cumulative site) risk can be controlled, (actually, reduced), it appears, by running less plants (at any site) at the same time.

Asset Recovery

What is the monetary value of the nuclear fuel at all the sites that will not run anymore? (This includes Unit 5 and 6 of Fukushima Daiichi as well as all 4 units at Fukushima Daini. Also, the other units they have at another site and the stuff in the site fuel storage pools.)

Here is the idea: sell it.

Not only do you get some money for it, you have reduced your (present level of) responsibility for it.

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "Vanags, Uldis"; Screnci.Diane; P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); "Newal Agnihotri"; "Tom Henry"; ESTRONSKI@aol.com; [Bowman, Gregory](#); "Lyon, Jill"
Subject: Fukushima-related Comments for 7-23-2012
Date: Monday, July 23, 2012 10:28:43 PM

Good morning,

Acknowledging that there is presently a VERY effective Fukushima Daiichi news blackout, never-the-less, here are some topics I would like to see covered.

1. A comparison of the no-earthquake-damage-reported event today at Exelon/Oyster Creek, (Event Number 48125), where, apparently, emergency condensers were in service to remove decay heat with TEPCO/Fukushima Daiichi Unit 1 where no earthquake damage was reported and emergency condensers did not remove decay heat.
2. Water inventory progress. Has the contaminated water in building basements seeped through foundation (earthquake-caused) cracks and been pumped away by the newly installed site deep well pumps?
3. Any plans to flood up Unit 1 or Unit 2 or Unit 3 to reduce radiation dose.
4. Any reason to consider the Unit 1 and Unit 2 and Unit 3 spent fuel pools and their supporting structure(s) as not damaged.
5. Any progress in finding where nuclear fuel is now in Unit 1 and Unit 2 and Unit 3.
6. Any risk-based decision to off-load nuclear fuel from Unit 5 or Unit 6.
7. Any reduction in staff assigned to units that are no longer licensed.
8. Any risk-informed decisions on removing the nuclear fuel in reactors 1 to 4 at Fukushima Daini.
9. Any credible reason why unloading the shored up Fukushima Daiichi Unit 4 elevated spent fuel pool has to wait until the end of next year to begin in earnest.

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: [hillsc@INPO.org](#); [Bridget.Frymire@dps.ny.gov](#); "[Vanags, Uldis](#)"; [Screnci, Diane](#); [P.Kaiser@iaea.org](#); [jicc@ws.mofa.go.jp](#); [JLD_Public_Resource](#); "[Newal Agnihotri](#)"; "[Tom Henry](#)"; [ESTRONSKI@aol.com](#); "[Lyon, Jill](#)"
Subject: Fukushima-related Comments for 7-25-2012
Date: Wednesday, July 25, 2012 10:58:45 PM

Good morning,

Regulated Utilities

Did you ever work for a regulated utility? I did for about 14 years. A comment last week by the President, (I think), of TEPCO brought those days back to mind.

Because of their obligation to be a reliable supplier (such as of electricity), they are allowed a certain (decent) rate of return on their investment. Now you can see a problem might arise since the more they can spend, (say on a nuclear powerplant under construction), the more they will make. Of course, an alert Public Service Commission won't let that happen forever (as my former employer found out.) And, let me point out, (non-capital) expenses subtract from current earnings, thus reducing current profit.

What this means (as I saw it, anyway), is that, (at least eventually), there is a strong aversion to making money available to fix things. For example, while I was on an operating shift at Niagara Mohawk Power Corporation's Nine Mile Point, Unit 1, and they were spending money building Nine Mile Point, Unit 2, word was passed to us that, due to a (claimed) shortage of money, any big repair at Unit 1 would pretty surely mean the closing of Unit 1. And, of course, a lot of high-paying jobs would no longer exist. (That part about the loss of jobs was meant to get our attention.)

In this environment, people who come up with "reasons" why repair action should not be taken (and thus cost money) become treasured or highly thought of. It does not matter if the "reason" is credible or justifiable. This failure to take action is, in another word, (and in my opinion), irresponsibility.

I believe I saw this same attribute in the words of the TEPCO President who, (I believe I read), does not understand why people are criticizing TEPCO.

But I need to finish my story. After years of regulation, probably FERC, or maybe the New York State Public Service Commission decided to end New York State regulation of electricity generation to encourage competition and, hopefully, lower electricity prices.

When given the choice to use its decades of electricity generating experience to sell electric power in competition, or to sell their generating plants, Niagara Mohawk Power Corporation chose to sell all of their generating plants.

In short, it appears that years of regulation (of generation) had made them unable to compete.

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: [hillsc@INPO.org](#); [Bridget.Frymire@dps.ny.gov](#); "Vanags, Uldis"; [Screnci, Diane](#); [P.Kaiser@iaea.org](#); [jicc@ws.mofa.go.jp](#); [JLD_Public_Resource](#); "Newal Agnihotri"; "Tom Henry"
Subject: Fukushima-related Comments for 7-30-2012
Date: Monday, July 30, 2012 10:35:04 PM

Good morning,

Design Basis

One of the top Exelon people has said that nuclear power is a business, not a religion. Yet, it appears to me that the worship continues. I am talking about the current industry reverence applied to "design basis". Actually, I prefer to identify it as the original design basis to distinguish it from the (current) design basis necessary today in order to run a nuclear plant with a reasonable assurance of its safety to the surrounding public.

I think the basic argument is this: when we find that the original design basis is no longer adequate, do we "grandfather" the original design basis (and continue to use it) or do we change it (and the plant)?

Actually, that's not exactly the complete description of (U.S.) choices, is it? Here in the United States a practical alternative (which I support) has been proposed. It is to strengthen not the constructed plant but the ability to respond with additional, portable equipment available from Regional Centers.

However, here is the point. Until such promised Regional Centers are actually provided, what we are doing is, in effect, "grandfathering" the now-found-to-be-inadequate original design basis.

How long should we continue to do this?

Moving Fukushima Daiichi Unit 4 Spent (or Used) Fuel

I do not understand the difference if the inspected two fuel bundles show no damage or an excessive amount. Isn't it considered important to remove ALL the fuel in the elevated spent fuel pool before the next big (and unanticipated) set of external events strikes the site? What is taking so long?

(Remember, we were told that the fuel was not damaged and that it was always covered with water. Was this incorrect?)

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "Vanags, Uldis"; Screnci.Diane; P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); "Newal Agnihotri"; "Tom Henry"; ESTRONSKI@aol.com
Subject: AP1000 AC Power
Date: Tuesday, July 31, 2012 10:45:00 PM

Hello,

Having started out reading about the Byron incident, I found that the explanation for the AP1000 left me confused. So, I looked a little more, particularly after I read that they will NOT have safety-related emergency (diesel or other) generators. I believe I am reading ML03329042 right now. Let me say this. I also don't like the NRC approval of an exemption to the requirements of GDC 17 for two physically independent offsite circuits.

And, as I read it, I don't like the idea that the generator is apparently left connected to plant auxiliary loads AFTER a load reject signal for some special purpose.

It is perhaps important to recall that:

the Chernoble (?spelling?) problem occurred when they were trying to show that electrical loads could be carried after a plant trip. It didn't work.

It is perhaps important to recall that:

The Fukushima Daiichi units, (Unit 1, Unit 2, Unit 3, Unit 4, Unit 5, and Unit 6) appeared to have 3 lines supplying the six of them with offsite (AC) power provided by the same company that owned the nuclear plants. (INPO Report 11-005, page 2) When owned by the SAME company, it took some units 9 days to get offsite power restored, the other took 11 days. In other words, it didn't work.

It is perhaps important to recall that:

Fukushima Daiichi Unit I WAS a passive, (emergency condensers), safety system plant. It did not save the plant when needed.

Conclusion: these NRC decisions are, in my opinion, seriously eroding safety to the public.

Thank you,

Thomas Gurdziel
Member, ASME

From: [Tom Gurdziel](#)
To: [Mitchell, Matthew](#)
Cc: [CHAIRMAN Resource](#); [hillsc@INPO.org](#); [Bridget.Frymire@dps.ny.gov](#); "Vanags, Uldis"; [Screnci, Diane](#); [JLD Public Resource](#); [P.Kaiser@iaea.org](#); [jicc@ws.mofa.go.jp](#); "Newal Agnihotri"; "Tom Henry"; [ESTRONSKI@aol.com](#); [rich@oswegocounty.com](#); [barclaw@assembly.state.ny.us](#)
Subject: Lessons Learned Meeting of 7-27-2012
Date: Saturday, August 04, 2012 11:04:12 AM
Attachments: [License.jpg](#)

Hello Matt,

At about 1:10 into this meeting I heard a comment about not requiring licensed plant operators to train fully on improbable events. The reasoning was, I think, that they don't happen very often so why spend the valuable time?

Funny thing about that reasoning: I think it actually was responsible for the lack of in-depth preparedness at Fukushima Daiichi. Anyway, I want to tell you that the U.S. government, in 1966, would NOT let a private pilot get a Solo Certificate unless they had been trained in such an improbable event as a full stall. (In other words, since there was no lift on either wing, you weren't flying anymore: you, (and the airplane, were falling from the sky.)

I don't see why paid, currently licensed (by the U.S. government), nuclear plant operators should be held to a LOWER standard than required of private pilots 46 years ago.

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "Vanags, Uldis"; [Screnci, Diane](#); P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); "Newal Agnihotri"; "Tom Henry"
Subject: Fukushima-related Comments for 8-2-2012
Date: Thursday, August 02, 2012 10:35:12 PM

Good morning,

What, actually, is the cost of nuclear power?

Have you seen the periodic complaints that natural gas imported into Japan costs too much? The implication appears to be that nuclear power calculations can show that it provides cheaper electricity in Japan (than fossil fueled plants.) Can this be true?

Yes, I believe it can, but only if you selectively choose costs (prior to March 11, 2011) to compare. Probably the choice is "O & M" or Operating and Maintenance costs of only one operating powerplant.

Here is my understanding of the basic fact: nuclear fuel costs less than other types of fuel. (The cost of fuel is an operating cost.) But everything else costs a lot more. What you have to do is ignore all those extra costs of nuclear power.

For example:

Ignore the costs of all the buildings required. (Probably these are called "capital costs" and are entitled to a set return on investment, even if the plant is not run-able.) (Crystal River 3)

Ignore the "temporary" 50 or 60 year dry cask storage and security costs of spent nuclear fuel. (Somebody else has probably promised that this will be taken care of.)

Ignore the final cost of spent nuclear fuel disposal. (Nobody has solved this problem yet, anyway.)

Ignore the costs of building a sizeable decommissioning fund.

Ignore the decontamination (only) costs of a non-accident-decommissioned plant. (Note that decommission costs and decontamination costs are not the same thing.)

Ignore the cost of the (owning) company's headquarters-based technical staff associated with that plant.

Ignore the cost of a security force. (This is probably a confidential number.)

Ignore costs of required membership and participation in organizations like IAEA, WANO, and INPO.

Ignore the lost value of plants shutdown earlier than purchased for. (Rancho Seco; Three Mile Island, Unit 2)

Ignore the extra heat dumped into the earth's environment by a (nuclear) plant running at 33% thermal efficiency as compared to (fossil) plants running at 40%, up to 60%.

Ignore the cost of extended onsite storage of "low level" radioactive waste (such as spent demineralizer resins) where agreements for offsite disposal have not been made. (This may already be included as a current cost.)

Ignore the costs of all applicable national regulatory agencies. (NRC)

Ignore the cost of any promise to “brownfield” or “greenfield” the site after the site plants are shut.

Ignore emergency response organization membership and emergency equipment and training costs.

Ignore plants with extended outages. (Fort Calhoun)

Ignore the costs (incurred to date and projected) of any “events” or accidents. (Three Mile Island, Unit 2)

In short, instead of taking the cumulative cost of expenses of the nation’s entire nuclear fleet and dividing by the cumulative net generation (for that time period), just choose one plant being run successfully.

That should do it.

Thank you,

Thomas Gurdziel

From: Bobleyse@aol.com
To: [JLD_Public_Resource](#)
Subject: Re: Response to email "Hardened vents and filtered vents -- July (2012) repor...
Date: Monday, August 13, 2012 12:53:00 PM

This is my second reply.

I note that as late as the June 6, 2012, meeting of the full ACRS, Monninger referred to a report to the Commission this summer. From page 90 of 316 of the transcript:

So, what we -- we believe 5.2, the assessment of venting for other containment designs is very important, but we believe it's more important now to fully resolve the issue for Mark I and IIS, and to provide a recommendation to the Commission this summer on the Mark Is and IIs with regard to filter venting, or with regard to beefing up the already required vent such that it could withstand severe accident conditions.

Regarding the engagement with stakeholders, this has not been transparent.

Bob Leyse

In a message dated 8/6/2012 1:24:44 P.M. Mountain Daylight Time, JLD_Public.Resource@nrc.gov writes:

Mr. Leyse,

Despite Chairman Jaczko's departure, the NRC's actions in response to Japan will continue without delay. With respect to the filtered vents policy paper, the NRC staff has made significant progress on this evaluation and has had frequent engagement with stakeholders (nuclear power industry, public, and nongovernmental organizations). A thorough technical basis is required to support a recommendation to the Commission regarding whether containment vents should be required to operate under severe accident conditions, with or without filters; consequently, additional analysis is required to properly evaluate the potential safety benefit of such requirements. This additional analysis has resulted in an extension request until November 2012 to submit the policy paper.

Columbia Generating Station is subject to NRC order EA-12-50, "[Issuance of Order](#)

[to Modify Licenses with Regard to Reliable Hardened Containment Vents,](#)”
because it is a boiling water reactor with a Mark II containment. Columbia
Generating Station is required to install a reliable hardened vent by no later than
December 31, 2016.

Thank you for contacting the US NRC. If you have any additional comments or
questions, please feel free to contact us at this email address.

Japan Lessons Learned Project Directorate

Office of Nuclear Reactor Regulation

US Nuclear Regulatory Commission

=

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; Bridget.Frymire@dps.ny.gov; "Vanags, Uldis"; [Screnci, Diane](#); P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [JLD Public Resource](#); "Newal Agnihotri"; "Tom Henry"; [Sheehan, Neil](#)
Subject: Fukushima-related Comments for 8-13-2012
Date: Monday, August 13, 2012 11:20:42 PM

Good morning,

I am about halfway through listening to the 3 hr and 14 min recorded Fukushima Briefing of 8-7-2012. I am very impressed with the constructive comments I have heard so far. However, at approximately 1:03:31 and 1:08:15 I heard "coping time" mentioned. I did not, (and have not, ever), seen a definition of "coping time."

Does anybody actually know its definition, or is everybody expected to inherently know it?

Here is what it appears to be: a certain amount of time during which the station batteries, or some of them, do not go below a certain voltage WITHOUT SPECIFYING WHAT PLANT EFFECTS ARE TO BE ACHIEVED (by use of the batteries).

17 Month Status Report

Well, I have to mention that we got a new computer last week and I, right away, wrote up a 17 month status report. And, I will send it out as soon as I can get the e-mail Send feature to work. Here is briefly what I wrote.

There has been No spent fuel removed from the Units 1 – 4 elevated spent fuel pools.
There has been No new fuel removed from the Unit 1 – 3 elevated spent fuel pools.
There have only been 2 new fuel bundles removed from the Unit 4 elevated spent fuel pool.

The present location of the core material initially inside the Units 1 – 3 reactor vessels has not been identified.

No primary containment leaks for Units 1 – 3 have been reported as repaired.

No primary containment leaks for Units 1 – 3 have been reported as located/identified.

Units 1 – 3 have not been flooded up.

Water apparently continues to enter the site building basements, adding to the amount to be treated.

Proposed deep well (site) pumps have not been reported to have been put into service.

Injection methods (to seal leaking basements) have not been reported to have been used on the basements.

Here at home, No Regional FLEX Center has been put into operation.

The location of No Regional FLEX Center has even been announced.

At 17 months, do you feel that adequate progress has been made?

Thank you,

Thomas Gurdziel

From: cragg50@hotmail.com
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";
Date: Wednesday, August 15, 2012 3:42:08 PM

Below is the result of your feedback form. It was submitted by
(cragg50@hotmail.com) on Wednesday, August 15, 2012 at 15:44:48

comments: Chairwoman, Allison Macfarlane, I have the nuclear waste safer storage solution that you are looking for, the idea answers all of the related problems for a surface repository with a deep basement. The idea if built properly, is safe in ones back yard, looking at the 2 billion year old Gabon Africa site, I have have another area that is extremely old and offers one million years of safe storage. All is simple to explain, and far less costs than anything offered today. I would like to hear from you at your convenience? Thank you, Gregory Cragg.

name: Gregory Cragg

organization: Cragg Innovations

address1: 208-1552 Esquimalt Ave.

address2:

city: West Vancouver

state: ---

zip: v7v1r3

country: Canada

phone: 778-230-2717

From: esky@mac.com
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident";
Date: Monday, August 20, 2012 4:48:14 AM

Below is the result of your feedback form. It was submitted by
(esky@mac.com) on Monday, August 20, 2012 at 04:51:05

comments: Will you kindly pressure our government to take care of the spent fuels of Fukushima Reactor 4 since the action is so slow that we may face the more catastrophic event if the earthquake attacks again.

name: hayashi

organization:

address1:

address2:

city:

state: ---

zip:

country: japan

phone:

From: [Hanson, Corinne](#)
To: [JLD Public Resource](#)
Cc: [Fretz, Robert](#); [Skeen, David](#)
Subject: Filtered Vents and the NRC's Upcoming Decision
Date: Friday, August 24, 2012 2:59:16 PM
Attachments: [Mark Leyse High-Capacity Filters for BWR Mark Is and Mark IIs.pdf](#)

Attention: Japan Lessons Learned Project Directorate,

Please see the attached report, written for NRDC by consultant Mark Leyse, which comments on various safety benefits of installing high-capacity filters in addition to hardened vents for Boiling Water Reactor (BWR) Mark I and II containments.

http://docs.nrdc.org/nuclear/files/nuc_12070201a.pdf

The U.S. Nuclear Regulatory Commission has been delaying a decision on whether it will require filtered venting systems as part of its March 2012 order requiring hardened vents for BWR Mark I and II reactors. Staff is expected to provide NRC Commissioners with recommendations in November.

Modern-day filtration systems can achieve upwards of 99% efficiency in particulate removal and vastly reduce the potential for offsite contamination during an accident. Such systems are available from multiple vendors and can be retrofitted or incorporated into almost any design. Numerous reactor operators in Europe have taken the necessary precaution of installing these filter systems to "scrub" the vent flow of the majority of radioactive particulates, should there be need to vent to the outside environment. Nearly 20 years ago, France upgraded all of its pressurized water reactors (PWR) to include high-capacity filters and all German BWRs currently have venting systems outfitted with filters.

NRDC believes the American public deserves the right to be just as safe from the radiation released in a nuclear accident as citizens in France and Germany, and we insist that U.S. plant operators treat safety contingencies like their European counterparts: minimize the potential impact of an accident to the public and the environment.

Sincerely,
NRDC's Nuclear Team
Corinne Hanson
Natural Resources Defense Council (NRDC)
1152 15th Street NW, Suite 300
Washington, DC 20005
Phone: (202)-289-2370 (DC office)

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; bridget.frymire@dps.ny.gov; Uldis.Vanags@state.vt.us; P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [Screnci, Diane](#); thenry@theblade.com; newal@goinfo.com; [JLD Public Resource](#); estronski@aol.com
Subject: Current Flooding Studies/Walk downs (as a response to multiple tsunami waves at Fukushima Daiichi)
Date: Monday, August 27, 2012 7:24:15 PM
Attachments: [Flood debris0001.jpg](#)

Good morning,

I think I have mentioned this before and I think that I have seen no response. Studying flooding WITHOUT including destruction from impact of both water (itself) and water-carried debris is insufficient to assure safety, in my opinion. Yet, I believe this is what is being done here in the US.

One reference is page 7 of INPO Special Report 11-005, where it says: "Intake structures at all six units were unavailable because the tsunami and debris heavily damaged..." Note the words: "and debris".

Now turn to page 75 and read the top item. The fire engine at Units 5 and 6 could not be driven to Unit 1 because of earthquake damage to the road and debris from the tsunami had restricted access.

Finally, after a good number of hours searching, I have found an example of flood and debris damage at a bridge under construction in Vietnam in 1968. The temporary bridge in the middle picture is at a sufficient height but of an insufficient load-carrying capacity. Apparently a decision was made to provide a higher capacity bridge at a lower elevation and, (perhaps, as a tradeoff), accept the risk of damage with high water following very heavy seasonal rains. We repaired the bridge and put it into service. The point I hope to make here is that damage may have been less without the debris, (which can be seen in the lower picture.) The bridge was about 9 miles west of Dong Ha.

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](mailto:Tom.Gurdziel)
To: JLD_Public_Resource
Subject: FW: Fukushima-related Comments for 8-21-2012
Date: Monday, August 27, 2012 7:24:46 PM
Attachments: [Roseton, NY 3 of 3.jpg](#)

From: Tom Gurdziel [mailto:tgurdziel@twcny.rr.com]
Sent: Tuesday, August 21, 2012 11:06 PM
To: chairman.resource@nrc.gov
Cc: hillsc@INPO.org; bridget.frymire@dps.ny.gov; Uldis.Vanags@state.vt.us; P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; JLD_Public (Resource@nrc.gov); Diane.Screnci@nrc.gov; thenry@theblade.com; newal@goinfo.com
Subject: Fukushima-related Comments for 8-21-2012

Good morning,

Spent Fuel

I don't know if the two nuclear plants running in Japan are PWRs or BWRs. If they are BWRs with elevated spent fuel pools, it is my advice to unload ALL spent fuel older than 5 years as a preventive measure. (Probably this has already been done.) With the size of the already constructed spent fuel pools constant, the time to respond to a spent fuel pool accident should increase, thus reducing risk (in advance).

Performance-based Selection

I was working on the Roseton, NY two unit fossil fuel steam plant being constructed when I became amazed by the structural steel erection contractor. Didn't he know anything? Instead of erecting the first boilerhouse and turbine hall, then using what he had learned to do the second one better (as any engineering college graduate would have thought), he actually rented two cranes and called for two crews to be working at the same time.

Why? Well, it turns out that competition between crews had a much greater effect than any "learning curve." (The connecting gang at Unit 1 wasn't going to let the connecting gang at Unit 2 get ahead of them. And, the connecting gang at Unit 2 felt the same way about the Unit 1 gang.) (The picture is of one crew working in one boilerhouse.)

We need to get the fuel out of the damaged Fukushima Daiichi units and, so far, I would have to say that nothing has been done. (Two new fuel bundles is, in the overall picture, at 1 and ½ years, nothing.) Here is what I suggest. Split up the Unit 4 Spent Fuel Pool unloading job into two pieces and award two contracts. And do them both at the same time.

That's right. One can work from noon to midnight. The other can work from midnight to noon. We will be able to see who can do the work removing spent/possibly damaged nuclear fuel better. And, another plus, we probably won't see a lot of prima-donna behavior.

There probably will be two useful results. We will finally get the spent fuel out of the Unit 4 elevated spent fuel pool in our lifetime, (not 1 or 2 generations into the future), and we will have a good idea of who to use on the Unit 1 and Unit 2 and Unit 3 work.

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: hillsc@INPO.org; bridget.frymire@dps.ny.gov; Uldis.Vanags@state.vt.us; P.Kaiser@iaea.org; jicc@ws.mofa.go.jp; [Screnci, Diane](#); thenry@theblade.com; newal@goinfo.com; [JLD Public Resource](#)
Subject: Fukushima-related Comments for 8-30-2012
Date: Thursday, August 30, 2012 10:22:12 PM

Good morning,

Recognizing Changed Conditions

Once I get used to doing something a certain way, it is hard, sometimes, to realize that I need to change what I am doing since the conditions I am responding to have changed. So, I want to ask about drug testing in the Japanese nuclear industry. Do they have it? Who does it cover?

Based on the serious situations at Fukushima Daiichi, I feel that, not only should testing cover from the site superintendent all the way up to the TEPCO CEO, but it should also include site workers handling spent fuel who probably are working as contractors.

Additionally, has the program been reviewed recently so that it includes synthetic drugs?

Summary: Conditions have changed from running operable nuclear plants to removing radioactive debris. Has the drug testing program changed accordingly?

Misapplication of the Concept

I believe the concept of “time, distance, shielding” may be misapplied at Fukushima Daiichi. Let me explain.

Suppose you have a certain job to do in a high radiation area of a U.S. nuclear plant. We used three words to guide us in minimizing dose. We tried to minimize the time spent doing the job. We tried to keep away from the radiation source(s) as much as possible. And, for longer jobs, we considered the use of additional shielding.

At Fukushima Daiichi, as I presently understand the situation, “time” appears to be used as a reason to wait until the radiation source(s) decrease in intensity, resulting in no work presently being done. Notice the difference? The concept is applicable to getting work done, not delaying the start of work.

Passive Systems

Have you noticed a lot of industry activity showing that passive systems can work? I haven't, and I find this very disturbing. Let me tell you why.

Fukushima Daiichi Unit 1 had a passive system and it did not save the core. Of course, by identifying it as an “Isolation Condenser,” (“IC”), the fact that it is a passive system is not obvious

to the public. Anyway, people in the industry should know and they should also know that passive systems are features of the newest generation of nuclear plants.

So why is there such confidence that the new ones will work in an accident when a present one did not?

Here is what I think. The emergency condensers at Unit 1 should be suspected of having sustained serious earthquake-caused damage until it can be proven otherwise. Realize, though, that if it is proven that the earthquake did not damage the Unit 1 emergency condensers, you still have the problem of a redundant pair of passive systems that DID NOT WORK in an accident.

Regional FLEX Centers

Suppose that Waterford would have needed some of that promised-to-be-available FLEX equipment at a Regional Center for the hurricane that just passed. What would NEI tell the public? After 1 ½ years of running our plants, we are still not ready but, as you know, safety comes first with us?

Would that be believed?

Hardened Vents

I believe I have seen that the containment vents at Fukushima Daiichi were what we refer to as “hardened vents.” They DID NOT WORK.

Has anybody determined why? Or, better still, has anybody determined that they could have saved reactor cores if they could have been operated according to their procedures?

Here is what I think. The equipment is inadequate in size for the energy and volume of gasses generated in an accident. The use of a rupture disk just about guarantees failure, as does a requirement to throttle, (partly close), a valve in the exit flowpath.

Given that 3 hardened vents at Fukushima Daiichi resulted in 4 destroyed plants, has anyone considered that some changes might be advisable before applying them to all the BWR Mk II containments?

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: THolden@entergy.com; hillsc@INPO.org; bridget.frymire@dps.ny.gov; Uldis.Vanags@state.vt.us; P.Kaiser@iaea.org; Screnci, Diane; thenry@theblade.com; newal@goinfo.com; Jill.Lyon@cengllc.com; [JLD Public Resource](#); jicc@ws.mofa.go.jp; estronski@aol.com
Subject: Entergy/Waterford Event Number 48255
Date: Friday, August 31, 2012 10:31:38 PM

Good morning,

Where is the FLEX equipment?

You have an external event of a hurricane. You lose AC power to your EOF, (Emergency Operations Facility). You attempt to repair the tripped diesel generator. So far, so good.

Now would be the time to show the nation that you have FLEX equipment and the ability to use it by hooking it up until you get the diesel generator repaired. Note that the diesel generator was found "inop" at 0735, yet, when the NRC was notified at 14:13, or about 7 hours later, it still was not reported as fixed.

Take a look at INPO 11-005, page 9. It says that, at Fukushima Daiichi Unit 1, the core "may have uncovered as early as three hours after the earthquake."

Here is a Lesson to be learned: you don't have the luxury of "time" in an accident situation. Electric power MUST be supplied quickly.

And, if they still don't have any extra electric generators, what is the reason that the NEI-promised Regional FLEX Equipment center(s) could not respond?

This performance is disappointing. A year and a half after Fukushima Daiichi and I can't say we are ready yet.

Thank you,

Thomas Gurdziel

I don't buy the statement that the (probably noisy) TSC can work effectively as an EOF, either. And, when they lost one emergency telephone method of communication, why weren't all the others checked right away?

From: [Tom Gurdziel](#)
To: [JLD_Public_Resource](#)
Cc: [CHAIRMAN_Resource](#); Jill.Lyon@cengllc.com; hills@INPO.org; bridget.frymire@dps.ny.gov; Uldis.Vanags@state.vt.us; newal@goinfo.com; thenry@theblade.com; THolden@entergy.com; [Screnci, Diane](#)
Subject: Hardened Vents Order (EA-12-050)
Date: Monday, September 03, 2012 10:24:16 PM

Hello,

I am reading page 9 of 25 or page 6, which says that there are multiple physical barriers to contain radioactive material in an accident. Have you thought about that? It seems that the (separate) barriers exist in non-accident conditions. In an accident, doesn't the steam driven HPCI or RCIC pump take that now-radioactive steam (and other gases) and exhaust it straight into the containment?

So, in an accident, the fuel cladding is, if not gone, going and the reactor coolant boundary is bypassed.

Now I am on page 23 of 25 or the first page of Attachment 2. Paragraph 1 does not seem to address any BWR that does NOT dump decay heat into the containment. Specifically, emergency condenser plants, (passive system plants), should be getting rewarded for using "air" as their ultimate heat sink. But, they seem to be treated the same as BWRs that dump decay heat into their containment, then need electric power for their cooling water pumps (to move that heat energy out of the containment).

Same page, paragraph 1.2.1 says that 1% steam/energy must be removed. However, I believe that this is about 7 hours after a shutdown. Let me point out to you that INPO Report 11-005 on page 9 points out that "the core may have uncovered as early as three hours after the earthquake, and fuel damage might have commenced approximately 1.5 hours later." It is my opinion that 1% is much too small an amount. Also, I feel that other gases generated may have a lower heat removing capacity than plain water, (steam), and that alone would require larger pipes.

Same page, paragraph 1.2.3 is calling for those stupid rupture disks. I am sure in earlier correspondence to you that I have pointed out that Unit 2 NEVER was able to rupture their rupture disk. A reference would be page 89 of the INPO Report which says (for 0002 on 15 Mar), "except for the rupture disk, which remained closed". If you read the next 3 entries on page 89, you get to the "loud noise" at Unit 2.

I was glad to see your paragraph 1.2.6 instruction to not blow up adjoining plants.

Thank you,

Tom Gurdziel

From: francisco.tijerina@cfe.gob.mx
To: [JLD Public Resource](#)
Subject: Response from "Contact Us about Actions in Response to the Japan Nuclear Accident;
Date: Tuesday, September 04, 2012 4:01:15 PM

Below is the result of your feedback form. It was submitted by

(francisco.tijerina@cfe.gob.mx) on Tuesday, September 04, 2012 at 16:04:43

comments: Request Information Wide Range Radiation Monitor- Flex Fukushima

Hello NRC:

Reference: 2012-05-18 LTR to NRC for BWR ISG Input to NRC (BWROG-12020), BWR INTERIM STAFF GUIDANCE ELEMENTS FOR RHV ORDER MAY 2, 2012, section 1.2.5, By recommendation of BWR Owners Group (BWROG) by Flex-Fukushima, I have the following questions:

1. What is the classification of security of this Wide Range Radiation Monitor for HCVS (Safety Related or No safety related) by this document LTR?
2. The requirements by this document LTR are assuming a prolonged SBO but no core damage, is correct?
3. What must be the classification of security (Safety Related or No safety related) of this Wide Range Radiation Monitor for HCVS in severe accident with core damage (shall LOCA, Big LOCA, ATWS, prolonged SBO, BOP)? if the answer is No safety related, why?
4. This Wide Range Radiation Monitor for HCVS in severe accident with core damage (shall LOCA, Big LOCA, ATWS, prolonged SBO, BOP), must meet with NUREG 0737 and 10CFR100 (or 10CFR50.67 whichever is applicable)? if the answer is not, why not?

Thanks in advancement by your technical support, Bests regards

Francisco Tijerina
Engineering Analysis
CFE- Laguna Verde Nuclear Plant
Veracruz, Mexico

name: Francisco

organization: Laguna Verde Nuclear Plant

address1: Laguna Verde Nuclear Plant

address2:

city: Veracruz

state: ---

zip: 94270

country: Mexico

phone: 229 9899090

From: [Tom Gurdziel](#)
To: [CHAIRMAN Resource](#)
Cc: [hillsc@INPO.org](#); [bridget.frymire@dps.ny.gov](#); [Uldis.Vanags@state.vt.us](#); [P.Kaiser@iaea.org](#);
[jicc@ws.mofa.go.jp](#); [Scenci, Diane](#); [thenry@theblade.com](#); [newal@goinfo.com](#); [JLD_Public_Resource](#);
[estronski@aol.com](#)
Subject: Fukushima-related Comments for 9-9-2012
Date: Sunday, September 09, 2012 8:24:44 PM

Hello,

Who Speaks for the Public?

This past week, I noticed maybe 15 different articles identifying a named high level TEPCO person as saying, (as I recall), that fossil fuel is too expensive. I think the conclusion expected of the listener/reader is that nuclear (fuel) is cheaper.

Is it really that simple?

Actually, I believe a better question is: is that (unqualified) statement a responsible one? Wouldn't it be more accurate to compare the cost of owning and running one fossil-fuelled power plant for its intended lifetime with the cost of owning and running one nuclear-fuelled power plant for its intended lifetime, (or for its lifetime to date plus nuclear accident costs)? (Remember to divide by cumulative electrical generation so that you can compare cost per megawatt-hour of each.)

Who speaks for the public when it comes to fairly explaining electrical generation complete, (lifecycle), costs?

Thank you,

Tom Gurdziel

From: [Tom Gurdziel](#)
To: [Mitchell, Matthew](#)
Cc: [CHAIRMAN Resource](#); jicc@ws.mofa.go.jp; [JLD Public Resource](#); [Scenci, Diane](#); hillsc@INPO.org; bridget.frymire@dps.ny.gov; Uldis.Vanags@state.vt.us; P.Kaiser@iaea.org; newal@goinfo.com
Subject: Other Fukushima-type Concerns
Date: Sunday, September 09, 2012 9:30:33 PM

Hello Matt,

As we discussed, I want to know if there has been any drug testing in the Japanese nuclear industry. In 1 and 1/2 years, I have never seen it mentioned.

Additionally, I would like to know how they accumulate individual plant decommissioning funds. Or do they? In my opinion, an honest accounting of nuclear electrical generation cost in Japan must include this eventual expense.

And, I talked with you about NOT supplying water (to overheated nuclear fuel). I talked with Bill Cook and he told me that the SAMGs address what I was talking about. (They didn't exist when I was on shift.) Nevertheless, I want to know if all the steps in the existing SAMGs have been reviewed to see if, in particular, adding water at any point would actually cause more damage than not providing it (at that time.)

(I think that what I am trying to say here is that having a success path may not be sufficient. It may be that you would need a success path without any interfering failure mode.)

Thank you,

Tom