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**General Information**

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OEDO Due Date:

Other Assignees:

SECY Due Date:

Other Parties:

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**Other Information**

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OCM Concurrence: No

Special Instructions:

OCA Concurrence: No

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Fukushimas

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Addressee: Chairman Macfarlane

Incoming Task: Letter

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AUTHOR: Bruce Skud

AFFILIATION: MA

ADDRESSEE: CHRM Allison Macfarlane

SUBJECT: Concerns regarding the Seabrook Station

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EDO --G20120877

**No More Fukushimas!  
c/o Bruce Skud  
14 Olive Street  
Newburyport, MA 01950**

The Honorable Allison M. Macfarlane, Chair  
Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

November 8, 2012

Dear Chairwoman Macfarlane:

We appreciated receiving a Nuclear Regulatory Commission (NRC) response to the August 28, 2012, letter that we sent to the NRC concerning Seabrook Station relicensing. The NRC's response (October 17, 2012) came from Dennis Morey, Chief, Project Manager 1, Projects Branch Division of License Renewal, Office of Nuclear Reactor Regulation (Docket No. 50-443).

In our letter, we highlighted a concern openly discussed NRC meeting April 26, 2012, on Seabrook relicensing held in Hampton, New Hampshire. Data indicates that due to climate change there could be an increase in sea levels and storm surges that would affect the Seabrook plant. Obviously, the flooding of the Seabrook plant campus should be a cause for concern, especially since the flooding is projected to occur within the timeframe of the relicensing period, 2030-2050.

In his response to our letter, Mr. Morey categorically rejected the idea that this rising sea level information was of any relevance to the relicensing of the Seabrook plant:

Regarding your concerns about the current design-basis flood level calculations..., please note that these issues are not part of the NRC's review of a license renewal application. A license renewal review is not a re-review of the facility licensing basis; rather, it is focused on managing the age-related degradation of passive systems, structures, and components to ensure they will fulfill their safety-related functions, as specified in the current licensing basis.

The NRC has multiple processes to evaluate the adequacy of current plant operations and licensing bases. Should the NRC become aware at any time of information calling into question the continued safe operation of any nuclear power plant, including Seabrook Station, the NRC will take the appropriate actions as part of the agency's ongoing safety oversight, regardless of whether those plants have sought or are seeking a renewed license.

In the twists and turns of bureaucratic thinking, Mr. Morey may be technically correct that climate-change-related flooding is not an "age-related" deterioration artifact. But, Mr. Morey seems to brush off the fact that new global climate conditions could completely reconfigure the safety profile of the plant. We believe that whether or not climate-change-related flooding falls within "design-basis flood calculations" is a hairsplitting issue for bureaucrats. However, for those of who live near the plant it's a major safety issue. Therefore, if necessary, we respectfully recommend that NRC modify its relicensing concerns to include global climate change/rising sea levels in its license renewal framework.

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Furthermore, Mr. Morey must know that the NRC has identified “alkali-silica reaction (ASR)” as a potential long-term threat to the reliability of the Seabrook plant and that structural degradation due to ASR is currently under the NRC’s relicensing review. The flooding water will obviously raise levels of saltwater saturation, which will accelerate concrete degradation so, on that basis alone, the flooding should be within the Seabrook relicensing purview.

Finally, since Mr. Morey did not identify the steps the NRC plans to take to address flooding at the Seabrook plant, we surmise that the NRC does not consider flooding due to sea-level rise to be a problem. Our concern has escalated since researchers at the Shorenstein Asia-Pacific Research Center at Stanford University in an October 31, 2012, piece in the *Washington Post* reported that they had conducted a study that assessed the vulnerability of nuclear plants flooding around the world.

The Stanford researchers collected information on plant height, sea wall height and the location of emergency power generators for 89 nuclear plants that lie next to water. They compared this to historical information on high waves triggered by various sources, such as earthquakes, landslides and hurricanes. The study found that the U.S. plants most vulnerable to inundation are the Salem and Hope Creek plants on the New Jersey/Delaware border; the Millstone plant in Connecticut; and *the Seabrook plant in New Hampshire* (italics added). *We strongly urge you to contact the researchers and obtain this invaluable information from them directly.*

That said, we ask the NRC—as we did in our August letter—to review the risk that rising sea levels, storm surges or increased groundwater saturation of concrete poses to residents who live in the vicinity of the Seabrook nuclear power plant. As we have stated, we believe it is entirely appropriate to do so within the purview of the license renewal process. But, in the spirit of public safety, which we believe should be paramount—we urge the NRC to use whatever regulatory tools are needed to investigate this critical issue.

Sincerely yours,

*Bruce Skud and Joanna Hammond*

Co-founders, No More Fukushimas!

B. Kud  
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The Honorable Allison M. McFarlane, Chair  
Nuclear Regulatory Commission  
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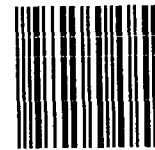
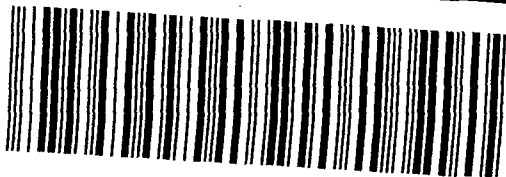
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