

TO: LEEDS, NRR
CY: MERKLE, CEO

Boyer, Rachel

From: CHAIRMAN Resource
Sent: Monday, January 14, 2013 8:11 AM
To: Remsburg, Kristy; Lewis, Antoinette; Mike, Linda
Subject: FW: Additional Comments After Listening to the entire recorded 1-9-2012 Briefing on Venting Systems

From: Tom Gurdziel [<mailto:tgurdziel@twcny.rr.com>]
Sent: Sunday, January 13, 2013 3:05 PM
To: CHAIRMAN Resource
Cc: Casto, Chuck; Uldis Vanags; Bridget Frymire; newal; thenry; T Holden; Jill Lyon; jicc; JLD_Public Resource; ESTRONSKI@aol.com; Screnci, Diane; Mitlyng, Viktoria
Subject: Additional Comments After Listening to the entire recorded 1-9-2012 Briefing on Venting Systems

Good morning,

The commercial nuclear industry's tactic to move fast and come up with a method before the US NRC could get moving has worked. Today we have the FLEX philosophy and none of the FLEX equipment is covered by any plant's Technical Specifications. As I see it, (and I have been told (by NRC people) differently), that removes that equipment from any effective regulation. Although I am in favor of the addition of FLEX equipment, I want to point out that I have not seen any consideration of the additional amount of people that will be needed to run it for BOTH supplying water to the reactor vessel, and now, (after thinking about the 1-9-2013 meeting a little bit), for supplying 300 to 500 GPM to the containment while, all the while, determining that the height of water in the primary containment does not exceed height limits. Also, note that the amount of water going into the primary containment by containment spray has to be throttled (to a dribble), AND, venting of the primary containment must be done 6 or 10 times using all that gas stored in cylinders (for valve motive power) (which Fukushima Daiichi showed was an insufficient amount) all the while monitoring containment pressure.

Why is this?

The answer is simple. It costs the owner less money to additionally burden the licensed operators than to solve problems by installing physical equipment.

In my opinion, the (secret from the public) plant FLEX equipment obtained to date is probably adequate but consideration of the skilled and TRAINED manpower, (person power?), necessary, and especially, the need for an adequate Command and Control function are even MORE IMPORTANT AND HAVE BEEN COMPLETELY OVERLOOKED SO FAR.

My thoughts on filters for BWR plants are that it is a waste of time until you provide venting capability from time T=0 for accident gases. Presently, you do not. But, supposing that you think filters are a good idea, why don't you tell the BWR Owners Group to design one filter to suit all US BWRs. Then you just have one review to do.

Let me add here that I was not impressed hearing that the NRC has to get its EPRI information from the EPRI website. This shows me a very definite lack of respect for your technical ability and for your regulatory position/authority. And, it bothers me a great deal that when a Commissioner asks for a document that has been referred to during the meeting, instead of hearing that "I will get it to you right away", I hear something like: "I will try to initiate a conversation that may result in you getting the material." I didn't like that at all.

TEMPLATE: SECY-017

ERINC: SECY-01

Also, and I think David Lochbaum mentioned this as well: you are in trouble with the containment because you couldn't supply enough water to the fuel initially in the reactor vessel but, magically(?) you have all the water you need for human action to save the primary containment. Is there an administrative prohibition to the loss of sufficient cooling water on any US site during any accident that may occur? Because, it would appear to me that low water level would be an initiator that could cause significant trouble to ALL plants on any site, (and would include the loss of any city water supplied from the same source.)

Let me mention that I found the audio of the recorded meeting, (which is what I listened to), of poor quality. I especially noticed this during the second part of the meeting. I found trying to follow comments of the staff then quite difficult at times.

Finally, let me say that there appeared to be a great confidence in everybody's computer programs. I find this unjustified, especially those without any testing. Might I just mention to you that, recently, a number of powerful computers were linked together, (I was told), to solve that troublesome Progress Energy/Crystal River 3 containment cracking, (ok, use the words "delamination"), problem. After 15 months of computing, the result was failure. And, knowing this, there was another try and another failure. I do not believe that a structural mechanics problem is as complicated as the nuclear accident problem we are trying to address.

Thank you,

Tom Gurdziel