

RULES AND DIRECTIVES  
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# PUBLIC SUBMISSION

2013 JUN 25 AM 9:32

As of: June 25, 2013  
Received: June 02, 2013  
Status: Pending\_Post  
Tracking No. 1jx-85ol-q1al  
Comments Due: June 03, 2013  
Submission Type: Web

**Docket:** NRC-2013-0063

Draft Environmental Assessment and Finding of No Significant Impact

RECEIVED

**Comment On:** NRC-2013-0063-0002

Entergy Nuclear Operations, Inc., Indian Point Nuclear Generating Unit No. 3; Extension of Public Comment Period

**Document:** NRC-2013-0063-DRAFT-0110

Comment on FR Doc # 2013-10792

## Submitter Information

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**Organization:** three parks democrats

5/7/2013  
78 FR 26662  
121

## General Comment

To the NRC Board and Inspectors,

According to your own reporting the aging plant and all the "band-aid" solutions are not sufficient to meet safety standards. What follows is an excerpt from a January, 2008 memorandum from inspector general Bell to chairman Klein regarding the failure of a fire insulation material to provide the protection that it is supposed to:

Following the August 2000 determination by the NRC that the manufacturer qualification tests for Hemyc were not sufficient to qualify Hemyc for use as a fire barrier in NPPs, the NRC initiated a program to perform NRC sponsored confirmatory testing of the Hemyc fire barriers. Efforts began in 2001 to complete confirmatory testing of Hemyc by 2002. It was not until March 25, 2005, that a confirmatory test of Hemyc was conducted by NRC. The test resulted in a finding that the Hemyc fire barrier failed to perform for 1 hour as designed. In April 2005, the NRC published the results of the tests in an NRC information notice to all licensees. The notice described problems observed with Hemyc during the testing, and the report stated that Hemyc fire barriers do not provide the level of protection expected for a 1-hour rated fire barrier. The notice did not require licensees to take any action or to provide a written response. (<http://www.nrc.gov/reading-rm/doc-collections/insp-gen/2008/e1-05-46.pdf>)

And, sure enough this was followed by an alert and issuing of the test results to all holders of operating licenses with the following statement :

SUNSI Review Complete  
Template = ADM-013

E-RIDS = ADM-03  
Add: D. Pickett (dup 1)

<https://www.fdms.gov/fdms-web-agency/component/contentstreamer?objectId=0900006481306e0d&for...> 06/25/2013

**PURPOSE**

The U.S. Nuclear Regulatory Commission (NRC) is issuing this information notice (IN) to inform addressees of the results of Hemyc electrical raceway fire barrier system (ERFBS) full-scale fire tests. The Hemyc ERFBS did not perform for one hour as designed because shrinkage of the Hemyc ERFBS occurred during the testing. It is expected that recipients will review the information for applicability to their facilities and consider actions as appropriate.

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**Attachments**

1 NRC fire code violations

To the NRC Board and Inspectors,

According to your own reporting the aging plant and all the “band-aid” solutions are not sufficient to meet safety standards. What follows is an excerpt from a January, 2008 memorandum from inspector general Bell to chairman Klein regarding the failure of a fire insulation material to provide the protection that it is supposed to:

*Following the August 2000 determination by the NRC that the manufacturer qualification tests for Hemyc were not sufficient to qualify Hemyc for use as a fire barrier in NPPs, the NRC initiated a program to perform NRC sponsored confirmatory testing of the Hemyc fire barriers. Efforts began in 2001 to complete confirmatory testing of Hemyc by 2002. It was not until March 25, 2005, that a confirmatory test of Hemyc was conducted by NRC. The test resulted in a finding that the Hemyc fire barrier failed to perform for 1 hour as designed. In April 2005, the NRC published the results of the tests in an NRC information notice to all licensees. The notice described problems observed with Hemyc during the testing, and the report stated that Hemyc fire barriers do not provide the level of protection expected for a 1-hour rated fire barrier. The notice did not require licensees to take any action or to provide a written response. (<http://www.nrc.gov/reading-rm/doc-collections/insp-gen/2008/el-05-46.pdf>)*

And, sure enough this was followed by an alert and issuing of the test results to all holders of operating licenses with the following statement :

#### **PURPOSE**

*The U.S. Nuclear Regulatory Commission (NRC) is issuing this information notice (IN) to inform addressees of the results of Hemyc electrical raceway fire barrier system (ERFBS) full-scale fire tests. The Hemyc ERFBS did not perform for one hour as designed because shrinkage of the Hemyc ERFBS occurred during the testing. It is expected that recipients will review the information for applicability to their facilities and consider actions as appropriate to avoid similar problems. However, suggestions contained in this information notice are not NRC requirements; therefore, no specific action or written response is required. (<http://www.nrc.gov/reading-rm/doc-collections/gen-comm/info-notices/2005/in200507.pdf>)*

Can you imagine our surprise when we found out that “no specific action or written response is required” ?!! Who are you working for and to what end? You don't even ask the intended recipients if they have received and read the report. This gives lie once again to the “culture of safety” at Indian Point. Even if it were made safe by all that is humanly possible, which is clearly not the case. You cannot answer questions about what would happen if a weather event strikes Buchanan. You can tell us that we are safe if the river rises a certain number of feet, but beyond that we all know that we will be forced to use inadequate and impossible evacuation plans if we even get signaled to evacuate before it's way too late. You need to grow up and stop playing footsie with our future. It's time to decommission the old plant as designed and stop sucking up to Entergy. Have a great day!

Erlend Kimmich