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Consequence Study of a Beyond-Design-Basis Earthquake Affecting the Spent Fuel Pool for a U.S. Mark I Boiling Water Reactor

Comment On: NRC-2013-0136-0002

Draft Reports; Availability: Consequence Study of a Beyond-Design-Basis Earthquake Affecting the Spent Fuel Pool for a U.S. Mark I Boiling Water Reactor

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Submitter Information

Name: Robert Vandebosch

Address:

6233 52nd Ave NE
Seattle, WA, 98115

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General Comment

General weaknesses of the Study

- 1) Study terminated after 3 days. One learns from Fukushima that adequate offsite emergency response cannot be guaranteed within 3 days.
- 2) Too much credit is given to mitigation. It is difficult to predict all scenarios that could compromise mitigation.
- 3) Inclusion in tables of cancer results assuming the existence of threshold doses goes against recommendations of radiation health professional organizations that LNT should be used.

Specific suggestions

- 1) p. 35. You give an example of a translation of a specific ground movement (0.12) into an earthquake magnitude. A similar example for your 0.7 g ground motion would be helpful.
- 2) In several tables and figures (eg Table 37, Figs. 96 and 97) you use the term "population-weighted" for Individual Latent Cancer Fatality Risk. I don't understand what this means for an individual. A search on the term "population-weighted" reveals it is never defined or explained in the text of the Report.
- 3) Most of your High Density results are for a (1 x 4) configuration. But not all reactor pools are loaded in this configuration, and the length of time that regulations allow for achieving this density is said to be a secret (p. 208). Thus you are emphasizing a risk less than that actually associated with some pools.

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Add = J. Algam9 (DRA)*