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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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General Comment

Dear NRC Commissioners,

I continue any and all previous comments. I request these comments be added to previous comments and not as any contradiction or reduction of previous comments.

I wish to state and join in the comments of Dave Lochbaum, and add my further comments to the report and Lochbaum's comments.

Both Lochbaum and NRC's report suffer because we cannot foretell the entire future. Who would suspect that Fukushima would suffer a nearby 9+ earthquake followed by a 30+ tsunami. And most of the height of the tsunami was due to a design error in the sea wall! Can anyone guess what design errors will cause what in the future?

Much of the NW United States and West coast Canada have mirror image geology to the Fukushima coast. Has anyone tried to figure out if a 9+ earth quake and 30' tsunami is likely anywhere along that coast?

Back in the 1970s Robert Minogue accepted the fact of split spent fuel rods in my comments and in the fuel. He added an overpack so that uranium pellets would not contaminate an area in a transportation accident. The subject of non-related zirconium deviations have not been discussed fully. Zircon can ignite. Are there any configurations and accidents that can ignite zirconium if the surface, alloying or other parameters are outside of the design due to error or other?

SUNSI Review Complete

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Add= D. Calyanna (dra)

These are not comprehensive or definitive challenges that have not been studied in the report. I hopw that NRC continues to look even if we can never find all the problems before they erupt as at Fukushima.

I wish that I could say,
respectfully submitted,

Marvin Lewis

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