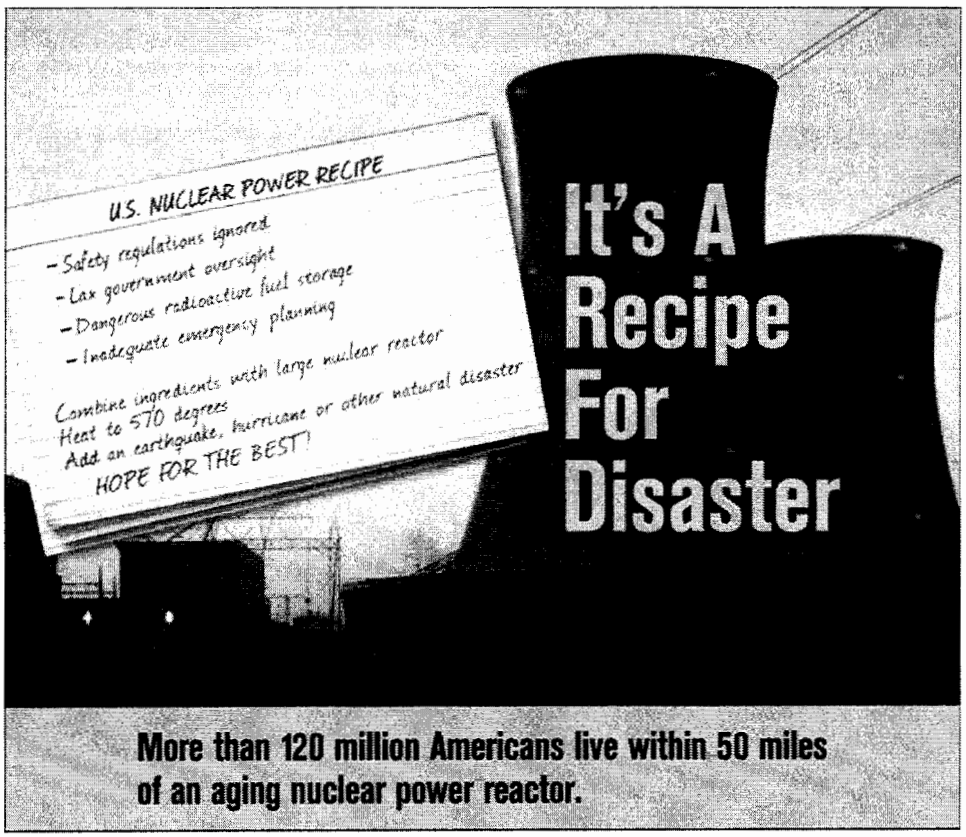
**Joosten, Sandy**

**From:** Eddy.N@verizon.net
**Sent:** Monday, August 12, 2013 11:04 AM
**To:** CHAIRMAN Resource
**Subject:** safety

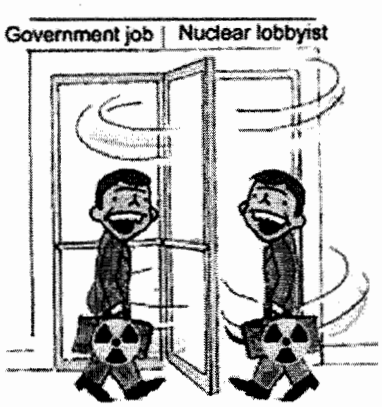
Dear Allison

Faulty assumptions by financial regulators led to the Lehman Brothers 2008 crash and many other disastrous results. Similarly, NRC made numerous assumptions before Fukushima that turned out to be totally false. NRC wrongly assumed that: (1) The containment vessels in nuclear reactors always maintain their containment, but Fukushima's reactors lost ALL containment; and (2) If radioactive gasses leak, they can only leak a maximum of 1% of their radioactive fuel per day. Fukushima's lost 300% per day, where the radioactive gases were leaving the containment every 8 hours.


The American people are outraged that NRC has made some flawed assumptions putting the entire country in harm's way. The chance of failure for a car, lightbulb or power plant, is governed by the bathtub curve where the failure is high early on due to material imperfections, assembly errors, or the user just doesn't know how to use the new item in the break-in phase. On the other side of the curve, the failure rate starts increasing again due to wear-out phase, aging, and rusting. NRC has been using that flat middle portion to justify reducing the frequency of inspections even though all plants are heading towards, if not already in, the wear-out phase, where the rate of failure starts increasing again. By reducing inspections based on the flat part of the curve, NRC intentionally is not testing often enough, and things may break like Palisades or San Onofre. NRC is ignoring one of the fundamental laws of engineering science, which is putting ALL Americans at risk.




We condemn NRC for creating incentives leading to unsafe nuclear plants where in 2013 alone we had 4 nuclear reactors shut down due to unfavorable economics. A number of other plants that were proposed were cancelled due to costs. Many of the existing reactors have been operated with up to a 20% higher power level than they originally were built for or licensed for. Many have already been that way and there's also a few applicants that have submitted requests to NRC to do upgrades at their plant. In addition, more than three-quarters of existing reactors have sought and obtained 20 year extensions to the original 40-year operating lifetimes, and the others are in the process of doing so as well. The industry's success in boosting operating output from existing plants and extending the life of the plants has been a major factor in preventing new reactors from being deployed, because you've pushed off the need for replacements.




The new reactors will not be safer because it was actually the US government that prevented that, even though that was not their intent. Back in 1957, Congress passed the Price-Anderson Act, which provides federal liability insurance for plant owners and vendors which allows the safest or the least safe reactor in the world to pay the same insurance rate. In a more unrestricted marketplace, a safer car or a safer feature would have lower insurance premiums. New reactors could be safer, but federal insurance makes it harder to sell, because the competitor down the road may not do that. If a plant owner is looking at whether it would cost more to upgrade

a 40 year old plant or to spend a little more to build a brand new reactor, the government is providing a disincentive for public safety and not doing right by the American public. The government is not providing the correct long-term incentives to make smart decisions.


Old reactors are falling apart piece-by-piece and they are so far past their original projected operating life that corrosion and broken parts are catching up to them. Some of the owners are doing the upkeep to protect their investment but others, because they don't have enough money, or they're shortsighted, and just looking at this quarter's bottom line – aren't making those investments. NRC must reject bribes from the nuke lobby, step in and protect the public from reactor degradation, because it has not been aggressive in that regard. In March 2012, a senator asked NRC whether Fukushima could happen here. NRC responded "no" despite the fact that an NRC study had shown that if a certain dam in the US fails, there's a 100% chance that 3 reactors would melt down.


In extending the lifetimes of existing plants, we are shocked that NRC doesn't obey the rules themselves. Specifically, NRC has grandfathered some reactors in, saying that new safety upgrades won't be required, because the plant is nearing the end of its operating life. When NRC grants a 20-year extension to the plant, it doesn't go back to look at what safety problems the plant may have had before getting grandfathered in. NRC sweeps all past safety issues under the rug and irrationally pretends that the plant was in perfect shape when its renewal license was issued through the grandfather process. That false assumption is criminal negligence that violates basic engineering principles. We demand NRC to use sound engineering analysis, lest our great nation suffer a Fukushima nuclear accident, or worse.