

Remsburg, Kristy

From: Tom Gurdziel <tgurdziel@twcny.rr.com>
Sent: Thursday, August 22, 2013 6:11 PM
To: JLD_Public Resource
Cc: CHAIRMAN Resource; jicc; Uldis Vanags; Bridget Frymire; P Kaiser; thenry; Jill Lyon; T Holden; Screnici, Diane; ESTRONSKI@aol.com
Subject: Today's Public meeting on the Tier 3 Analysis of Expedited Spent Fuel Transfer

Hello,

I attended the meeting but was not selected to make my intended comments, possibly due to some telephone (and computer) trouble I had.

I decided to take a look at the Expedited Spent Fuel Transfer study a day or two ago. The study is not as challenging as I had expected. In fact, it is not challenging at all.

In Japan a couple of years ago, the result of an earthquake and 3 operating plants resulted in 4 damaged, (maybe totally destroyed), plants with an estimated cost of at least 132 Billion US dollars to address all the nuclearplant-caused damage. Roughly, that comes out to a cost per destroyed unit of about 35 Billion US dollars. And, at the time, there was fear that the Unit 4 (elevated) spent fuel pool might be about to collapse. So, as I recall, immediate, (yet not disclosed to the public), repairs were reported as made. Additionally, the water level in the pool was unknown, possibly not even existing any more: we did not know. So I think you can say that the situation was serious.

So here is what I expected to see. Our people would assemble a model that, when applied to the subject plant, (a Peach Bottom unit), would result in the same amount of damage. They didn't do that.

Well, okay. (Forget verification & validation.) Maybe just assume you didn't make any mistakes modeling the earthquake effects and use a worst case event. They didn't do that.

It appears they configured the plant to cause the LEAST possible chance, (limited to less than 3 days), of sloshing and of water loss by modeling the spent fuel pool with the canal gates CLOSED. And, despite the lesson that should have been learned that risk-informed anything, (introduced in the days of Chairman Dr. Shirley Jackson), does not protect you from that event of very low PROBABILITY (and very high cost) that puts you into very big trouble, they were " binning ", (using risk methods), the results.

The spent fuel pool configuration chosen for the study is inadequate to allow credible decisions to be made about necessary regulatory action.

Thank you,

Tom Gurdziel
Member, ASME