## PUBLIC SUBMISSION

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**Docket:** NRC-2013-0283

Duke Energy Florida, Inc. Crystal River Unit 3 Nuclear Generating Plant Post-Shutdown Decommissioning **Activities Report** 

Comment On: NRC-2013-0283-0001

Duke Energy Florida, Inc., Cyrstal River Unit 3 Nuclear Generating Plant Post-Shutdown Decommissioning

**Activities Report** 

**Document:** NRC-2013-0283-DRAFT-0006

Comment on FR Doc # 2013-31317

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## **General Comment**

Docket ID - NRC-2013-0283

Comments on the Post-Shutdown Decommissioning Activities Report (PSDAR) for the Crystal River 3 Nuclear Power Plant

Putting Crystal River 3 Nuclear Power Plant (CR-3) in long term SAFSTOR has major issues that are not addressed in this Post-Shutdown Decommissioning Activities Report (PSDAR) because of the structural integrity issues of the reactor building concrete containment wall. This PSDAR does not even mention the lack of structural stability (fails to meet the design basis of the reactor building concrete containment wall criteria) of the 3.5 foot reactor building outside containment wall. This is the primary reason CR-3 has been shut down and will never be returned to service but this PSDAR uses bounding analysis techniques that ignore the fact that the reference Pressurized Water Reactor (PWR) used in NUREG-0586 has a reactor building primary and secondary containment that meet the design basis and CR-3 does not.

The bounding analysis used in Section 5.0, Environmental Impacts, of the PSDAR are flawed because the reference PWR used in NUREG-0586 (see Section 5.1) to evaluate environmental impacts does not have a severely damaged reactor building containment concrete wall. To the contrary, the reference PWR has both a primary and secondary containment that meet the design basis of a commercial nuclear power electrical

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generating plant. CR-3 is not bounded by the envelopes of analysis described in NUREG-0586 and NUREG-1496 as neither consider a nuclear power plant with a structural failed (does not meet design criteria) reactor outside concrete containment wall prior to the being placed in SAFSTOR.

This PSDAR has a major omission of the condition of the reactor building outside concrete containment wall and how this condition must be dealt with going forward. This PSDAR needs to be revised or amended now to address the existing failure of the reactor concrete containment wall and how the long term SAFSTOR of the plant will be effected.

I am a Duke Energy electrical customer that lives in Pinellas County, Florida. I am concerned that putting CR-3 in long term SAFSTOR is not the best option for the citizens of the surrounding area given the structural issues with this plant and that Duke Energy of Florida should make every effort to expedite the DECON option for this site.

Would you please acknowledge that you received my comments to this PSDAR and furnish me with a schedule when I should receive your response to my comments.

My contact information is as follows: Ricky C. Miles at phone number (865) 603-0804 or email address rmiles@ovssr.org.