

PUBLIC SUBMISSION

As of: May 16, 2014
Received: May 13, 2014
Status: Pending_Post
Tracking No. 1jy-8c2i-6cws
Comments Due: June 18, 2014
Submission Type: Web

Docket: NRC-2014-0071

Draft Regulatory Issue Summary; Tornado Missile Protection

Comment On: NRC-2014-0071-0001

Tornado Missile Protection; Draft Guidance

Document: NRC-2014-0071-DRAFT-0003

Comment on FR Doc # 2014-07576

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2014 MAY 16 AM 11:04

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4/4/2014
79FR18933

2

General Comment

As part of the conditions of the license in 10 CFR 72.212(b)(6), 10 CFR 72 general licensees (GLs) are required to evaluate site-specific tornado and tornado missile hazards against the generic spent fuel storage cask design certified by the NRC. Part 50 guidance is typically used by GLs to perform these evaluations. This RIS should be expanded to address this Part 72 evaluation of tornado winds and missiles. Specifically, does the design basis tornado need to be assumed to occur at any time on site, including when the cask is being loaded on the refuel floor or moved from the plant to the ISFSI? Or can probabilistic methods be used to eliminate consideration of (and designing protection for) tornado winds and missiles during these short-term operations?

SUNSI Review Complete
 Template = ADM - 013
 E-RIDS= ADM -03

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