

**PILGRIM WATCH COMMENT/QUESTIONS FLEX MOORING PLAN-
LESSONS LEARNED FROM JUNO BLIZZARD**

January 30, 2015

Pilgrim Watch supports NRC's Order EA-12-049 that requires additional mitigation requirements in the event of beyond-design basis external event- in this case supplemental coolant water to prevent a meltdown.

However Juno demonstrated to us that Entergy's plan to provide supplemental water has little to no probability of working. Did either Entergy or NRC actually test the plan during the height of the blizzard?

If no actual test occurred, as part of NRC's review of Entergy's response to the Blizzard, we ask that NRC evaluate that plan under Juno's conditions. We believe that it will become clear that NRC should require Entergy to go back to the drawing board and actually develop a plan that will work under extreme, but real, conditions. After all, climate change will bring more not fewer such events. The consequences of a loss of coolant accident are simply too great to allow Entergy's Rube Goldberg scheme to remain.

Purpose Waterways Project: The project is being undertaken to comply with NRC's response to Fukushima Lessons Learned-loss offsite power and subsequent loss coolant water.

What's Wrong

1. Storage shed(s) to hold the truck/trailer & pump: The project depends on a truck bringing a pump, and we presume flexible hose, to the Barge landing area.

a. During the Juno blizzard (01.27.15) was the single debris removal equipment able to move the snow to allow transport of equipment within the 6-9 hour time restriction from the shed to the Barge Landing Area? Could it have?

In anticipation of the blizzard did Entergy assign snow removal personnel and equipment to clear the shed and path to the Barge Landing Area and keep it clear during the storm? Could it have?

b. The sheds are vulnerable to heater malfunction; Equipment heaters protect FLEX equipment from cold weather damage. There is no regulatory requirement to monitor the storage shed heaters or to fix them within some timeframe if Entergy happens to notice that they are broken.

Were the heaters monitored in preparation for the storm and during the storm? Were they operable?

c. Getting to equipment and personnel to location: Now assuming that the vehicle, trailer and pump could get out of the shed, the plan non-conservatively assumes that it can get to the Barge

Landing Area-despite the possibility of conditions during Juno's blizzard- high waves on top of a storm surge at high tide, deep snow, ice and white-out.

Did Entergy or NRC test the assumption during the height of the blizzard - did they actually get the personnel and equipment to the barge landing area?

If no test under actual conditions was performed, how can either Entergy or NRC with a straight-face assume that workers could perform functions required on the jetty, assuming they even got there?

2. Snatch Block Pulley: The outhaul system consists of a snatch block pulley mounted with beam brackets on the foundation wall of the outer security fence at the barge landing area, connecting to the floating pulleys with anchor line.

We believe that under Juno's conditions that there would be a high probability of snagging from seaweed and debris caught on the lines and ice/snow clogging pulley. For example, there was a [freezing spray advisory](#) as part of small craft advisories since the storm. The advisory was still calling for 0.3-0.7 in. per hour accretion on Jan. 28th, after the worst of the storm had passed.

Did Entergy or NRC send personnel down to test the pulley- assuming it was ever installed? If so, what were the results?

Again if no test under actual conditions was performed, how can either Entergy or NRC with a straight-face assume that the pulley idea would work under those conditions?

3. Floating Strainer: The plan calls for two floating strainers to be connected to a semi-rigid suction pipe that will be deployed with the outhaul system, and anchored to the mooring.

How during the blizzard conditions could workers realistically perform this task? Was it tested during the storm?

4. Centrifugal Pump: The plan says that the suction pipe will then be connected to a centrifugal pump temporarily deployed by a truck at the Mean High Water Line, which will feed into the 6" stainless steel buried pipe, providing cooling water to the facility.

How during the blizzard conditions could workers realistically perform this task? Was it tested during the storm?

Conclusion

Going through the steps in the Waterways Plan, it is clear to us that a new FLEX plan is required and that NRC could not honestly approve Entergy's plan. We strongly doubt that there was any actual test conducted January 27 under real blizzard conditions. We equally strongly suggest

that if any test had been attempted, it clearly would have failed. Unless we are proved wrong, what possible justification could NRC have to approve the Waterways project?

Thank you for your consideration,

Mary Lampert
148 Washington Street
Duxbury, MA 02332
Tel. 781-934-0389
Email: mary.lampert@comcast.net
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