

From: aceactivists@comcast.net
Sent: Tuesday, April 07, 2015 2:41 PM
To: Bower, Fred
Cc: NRC - Neil Sheehan
Subject: QUESTIONS ABOUT 4-5-15 FIRE AT LIMERICK NUCLEAR PLANT

4-7-15

To: Fred Bower, NRC

From: Dr. Lewis Cuthbert, ACE

RE: QUESTIONS ABOUT 4-5-15 FIRE AT LIMERICK NUCLEAR PLANT

Any fire at Limerick is concerning to us, even if it has been declared "small". We have worried about fires at Limerick since 2008, when we learned that Limerick has not been required to comply with NRC's original safer fire safety rules.

Reports on the latest 4-5-15 fire at Limerick have left us with questions.

PLEASE CLARIFY THE FOLLOWING DISCREPANCIES:

1. **EXACTLY WHERE DID THE FIRE OCCUR?** There were different reports on the location of the fire.

- Mercury: Reported a fire ignited at one of the security buildings.

If the fire actually occurred in a security building, what is the function of this building and where is it located in proximity to the reactors?

- Reading Eagle: Reported that the fire was identified in a panel in the reactor building.

To what extent was the panel in the reactor building damaged by the fire?
What systems does this panel control?

2. **WHICH IS CORRECT? FACILITY RUNNING AT 82% OR AT FULL POWER?** There were different reports on the effect the fire had on operations.

- Mercury: Neil Sheehan of NRC said it was running at 82%.
- Reading Eagle: According to officials, power operations were not affected and both units remain at full power.

3. **WHY THE ALERT WAS REQUIRED FOR LIMERICK'S 4-6-15 FIRE.**

"ALERT" means events are in progress which involve substantial degradation of nuclear plant safety. As required, local and state officials had to be notified.

- Mercury: NRC reported that an alert was declared after a fire ignited at one of the security buildings.
- Reading Eagle: the "ALERT" was required because the fire was in the reactor building.

Questions:

- Why would a security building be involved with a system used to inject cooling water in the event the reactor needed to be shut down?
- NRC reported to the Mercury that the safety system that handles high pressure coolant injection was impacted.
- Sheehan said that that safety system will need to be repaired as a result of the fire.

Is it possible the reactor is operating without the repairs having been made, despite this fire being serious enough to trigger an "ALERT"?

4. WHY DID SHEEHAN STATE "THE REACTOR" IS AT 82%, AND AT THE SAME TIME SAY "THE FACILITY" IS IN "COAST DOWN" MODE?

We need clarification.

- Sheehan said, "the reactor", suggesting impact to just that reactor, yet said "the facility" was in "coast down" mode. Why was the entire facility in "coast down" mode, if just one reactor was impacted?
- Was "coast down" mode in progress prior to the fire or initiated by fire?
- Was "the reactor" operating at 82% prior to the fire or was it in response to the fire?
- Which reactor was operating at 82%?

Associated Issues:

Sheehan said, "A third of that fuel will be replaced".

- Was he referring to the scheduled refueling for reactor Unit 2?
- Was this "coast down" due to refueling or the fire?
- Isn't the fuel in the core continuously being depleted as a matter of operations?
- What was the exact date set for Unit 2 scheduled refueling?
- Will high-burn fuel be used for this refueling? Has it ever been used at Limerick previously?

Does the safety system that handles high pressure coolant injection impact both reactors? If not, which reactor was impacted? Unit 1 or Unit 2?

- Impact of damage to this system could be critical to safe operations since the system is used to inject water in the event the reactor is ever needed to be shut down and its pressure was still too high.
- NRC confirmed that all repairs have been made?
- If not, is there deadline for completing repairs?
- Were the materials needed for repairs immediately available?
- Was this part of the system for which Exelon just received an amendment to Amendment No. 174?

Questions about Limerick's fire brigade.

- The Reading Eagle said Limerick has an on-site fire brigade.
- How many Limerick fire brigade members are required to be on-site 24/7?
- How many were on-site when the 4-6-15 Limerick fire occurred?
- Where did the water come from to put out the fire?

The Mercury report stated NRC inspectors were promptly notified and told the fire is out.

Questions:

- Was there an inspector on site to actually observe the fire, how it affected the high-pressure coolant injection system, and whether the fire was actually out when Exelon made that claim? If not, why not?
- Why does NRC consider it prompt notification if the agency was not notified until the fire was out? What time did the fire start? What time was NRC notified that it was out?

Sheehan said, "the NRC will follow up with the facility to verify the alert was declared over. Before the alert can be declared over (NRC) officials will ...double check".

- We object to Exelon determining when such an alert is declared over. NRC should make such a determination.

Sheehan said the cause of the fire is still under investigation.

- Who is doing the investigation? Exelon? or NRC?
- We request to be notified about the cause of the fire when the investigation is completed.

Our concern is that Limerick's risky experiments may involve the system that was impacted by Limerick's 4-6-15 fire. The equipment which appears to be involved in the fire seems related to other recurring problems in this equipment since at least 2011. This suggests to us that Exelon's failure to provide safety improvements could have led to this fire.

- **Does NRC plan to issue a fine or violation associated with this fire?**