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# PUBLIC SUBMISSION

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**Docket:** NRC-2015-0073

Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving No Significant Hazards Considerations

**Comment On:** NRC-2015-0073-0001

Biweekly Notice; Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving No Significant Hazards Considerations

**Document:** NRC-2015-0073-DRAFT-0001

Comment on FR Doc # 2015-07192

3/31/2015

FR 17083

## Submitter Information

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## General Comment

RE: Grand Gulf NPS Mississippi: ID: NRC-2015-0073-0001

This is a serious topic & warrants more than a quick sneak through by the NRC .

Old Nuclear reactors, such as Grand Gulf, are more subject to embrittlement failure due to neutron & hydrogen attack. Failure could also be induced by corrosion. This problem worsened by uprates, as at Grand Gulf. They further stress old RPVs. Sudden failure of the RPV would lead to a catastrophic nuclear disaster.

The subsequent nuclear disaster would devastate America. Grand Gulf is a Mark III reactor type, which I understand requires hydrogen burn-off to protect from containment failure.

Mississippi is an agricultural and forestry state and appears the greenest state, which would make the impacts all the more devastating.

There must a public hearing for something so serious as calculating potential reactor pressure vessel failure. Neutron bombardment and hydrogen attack must both be considered, along with corrosion. Plus or minus 20% uncertainty, i.e. 40% total uncertainty, for anything, but especially for the reactor pressure vessel beltline embrittlement is unacceptable and constitutes premeditated homicide. Furthermore, there seems to be a more general side-stepping of statistical method and all logic in your document.

There must be a public hearing as the document is not written in Plain English, as required by law. It is largely incomprehensible to highly educated literate people. Furthermore, 20% of the most impacted population is

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believed illiterate. It must be re-written in English and presented orally, as well.

There should be a public hearing because an accident would potentially impact homeowners in all of North America, and insurance will not cover nuclear accidents.

The NRC grossly abuses the ASME (American Society of Mechanical Engineers) code by saying things such as "overpressurization The condition that occurs when pressure exceeds the design pressure of the component of interest by more than 10 percent, in accordance with the ASME Code", and "Pressure in the reactor coolant and main steam systems should be maintained below 110 percent of the design values in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code." (NUREG-0800) which is false. The ASME standard is not 110 percent of design values. This is also an abuse of math and language. You cannot be 110 percent of the maximum! This is especially true of boiler and pressure vessels!

Plus-minus 20% error, as you are allowing, which is 40% uncertainty (error-variation) is unacceptable by any scientific standard. For something so dangerous there should be 98 to 99% certainty with a 50 to 100% contingency of protection. Instead: "An extensive benchmarking program has been carried out to qualify the MPM neutron transport methodology. All of the requirements of RG 1.190 have been met. In particular, all C/M results fall within allowable limits (+/- 20% ), and it was determined that no bias need be applied to MPM fluence results. The uncertainty analysis indicates that all fluence results in the beltline region have uncertainty of less than 20%. The results of this analysis are documented in References 1 and 2. This meets the requirement of RP 1.4.1, 1.4.2, and 1.4.3." This is wrong. It is dangerous. It is unacceptable.

They are modeling the reactor "as built", whereas material degradation occurs over time, and the "as built" excluded the nuclear reactor power uprate.

Can "as-built" data for plant structures and material compositions be acceptable when the reactor pressure vessel has undergone material degradation - neutron bombardment, corrosion and high temp hydrogen attack- and other parts have been changed? For materials the answer is clearly no. Plus they say "wherever these data are available" which is a total loophole.

Trying to understand if the definition of conservative means understating risk, so as to protect the owner-operator-utility, or increased safety is impossible to without indepth study of the topic at hand. Also, are the safety margins adequate when the repercussions are so serious? They answer is clearly no. And, some of most of the safety margins appear to be negative, meaning a disaster is imminent. There appears not even 0% safety margin but rather negative, though with such a huge error allowed who can know?!

**IN SHORT, THIS DOCUMENT IS A DEADLY MOCKERY OF SCIENTIFIC METHOD, OF SAFETY, OF ASME AND OTHER STANDARDS, OF THE ENGLISH LANGUAGE. IT IS PRE-MEDITATED HOMICIDE. IT IS ENVIRONMENTAL RACISM AND CLASSISM. IT MUST BE RE-WRITTEN BY SOMEONE WHO IS LITERATE, IN ENGLISH, RE-PUBLISHED FOR COMMENT AND PRESENTED IN PUBLIC FORUMS BY SOMEONE WHO SPEAKS IN A CLEAR ENGLISH. IF YOU HATE AMERICA SO MUCH, PLEASE GO BACK TO YOUR HOME!**