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

Comment On: NRC-2015-0088-0001

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

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Submitter Information

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General Comment

ID: NRC-2015-0088-0001

ENTERGY OPERATIONS, INC., DOCKET NO. 50-368, ARKANSAS NUCLEAR ONE, UNIT NO. 2 (ANO-2), POPE COUNTY, ARKANSAS

While pretending that you are increasing safety oversight at Arkansas One, you are actually decreasing safety with this. Leaving the reactor in hot shutdown mode increases risk, decreases safety, at every level. It means that it will be slower and harder to get any incident-accident under control. Leaving it hotter increases the risk of pressurized thermal shock (PTS), too. The PTS risk increases with age, as does all embrittlement, and the Arkansas One reactors are old.

Perhaps most important for safety is that the pressure is also reduced going from hot to cold shutdown. At the cooler shutdown it is less likely to undergo pressurized thermal shock and catastrophic failure of the reactor pressure vessel. At the hot shutdown it is more likely to undergo pressurized thermal shock and catastrophic failure of the reactor pressure vessel (RPV). Hot Shutdown is 200-300 F and Cold Shutdown is 200 degrees F or less.

You need to read: Development of Standardized Probabilistic Risk Assessment Models for Shutdown Operations Integrated in SPAR Level 1 Model" S. Khericha, Ph. D. a* , J. Mitman b
a Idaho National Laboratory, Idaho Falls, ID, USA b U.S. Nuclear Regulatory Commission, Washington DC, USA

They state that risks for PWRs arise for ALL shutdown modes. Thus, it is best to put it into the overall safer

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Call = A. Master (AX138)*

mode, which is lower pressure Cold Shutdown.

"most of the risk from shutdown operations arises from Mode 4 (hot shutdown), Mode 5 (cold shutdown), and Mode 6 (refueling) for PWRs

The risk is dominated by the operators understanding of the event and the ability to respond appropriately. In the example PWR, more than 98% of the core damage frequency was dominated by operator action...

the risk to fuel damage (per hour) during shutdown operations is comparable to at-power operations".

You pretend that you are increasing safety at Arkansas One, all while decreasing risk! One death at Arkansas One wasn't enough for you?