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Technical Basis for Regulatory Guidance on the Alternate PTS Rule

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Comment On: NRC-2014-0137-0001

Draft Guidance Regarding the Alternate Pressurized Thermal Shock Rule

Document: NRC-2014-0137-DRAFT-0017

Comment on FR Doc # 2015-05754

Submitter Information

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FR 13149

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Organization: Don't Waste Michigan

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General Comment

Comments of Michael J. Keegan, Dont Waste Michigan.

The U.S. Nuclear Regulatory Commission (NRC) proposed utilization of regulatory guide (DG), DG-1299, Regulatory Guidance on the Alternate Pressurized Thermal Shock Rule and accompanying draft NUREG-2163, Technical Basis for Regulatory Guidance on the Alternate Pressurized Thermal Shock Rule is a misuse and abuse of methodological principles. Rather than the NRCs reliance on apples, oranges, bananas and watermelon as sister plant comparisons the NRC might better compare lemons to lemons. This entire fabrication and rationalization is for one nuclear plant and that plant is a lemon. The reliance of sister plant data to justify continued operation of the Palisades nuclear plant, known to have exceeded embrittlement as early as 1981 approaches aiding and abetting a criminal enterprise. Pull the capsules and look at real data, reliance on proxy data is absolutely fudging scientific inquiry.

The proposed DG-1299 provides slight of hand pseudo methodologies and instructions as to how to subvert inquiry into fracture toughness requirements for protection against pressurized thermal shock (PTS) events for pressurized water reactor (PWR) reactor pressure vessels (RPVs). This thinly veneered draft NUREG-2163 attempts to provide rationalization and justifications for the utilization of the technical basis for DG-1299 which is intended to subvert tangible, proven methods of inquiry into embrittlement. This is about covering the NRCs ass when things go south, as in catastrophic pressure vessel failure. Pull the capsules and look at the real data. Please stop the BS on excessive conservatism recapture with this fudged methodology.

The reliance on DG-1299 provides a scheme by which the NRC will ignore prima facie evidence and provides a fig leaf for the NRC to once again capitulate to production over public safety.

The NRCs consideration of this fabricated and strained methodology as an acceptable alternative fracture toughness requirement for protection against PTS events for PWR RPVs does not pass the smell test. The Alternate Fracture Toughness Requirements for Protection against Pressurized Thermal Shock Events predicts

SUNSI Review complete
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E-RIDS = ADM-03
Add = To. Stevens (gls4) - M. Kirk (mtk)
S. Pruslow (sxb3)

and explains nothing other than the extraordinary measures that the NRC and Entergy are willing to engage to dupe the public into acceptance of running into the ground the dilapidated Palisades limited liability (LLC) nuclear power plant. Once again production over public safety.

This contrived and strained process is all about Palisades and this scheme was cooked up in the late 1990s to keep Palisades running and subvert well established guidelines.

Time to pull the plug before catastrophic failure which the NRC and Entergy seem hell bent on delivering.

Thank you for your review

Michael J. Keegan

Dont Waste Michigan