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(4)

Submitter Information

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General Comment

Fuel Cycle Oversight Process
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You must keep the Emergency Cornerstone. You should reexamine the lessons learned from the Sequoyah Nuclear Fuel Accident, which included recommendations for an on-site Emergency Operations Center. Furthermore, due to the small size of many or all of the towns involved, the company should be required to fund an on-site clinic with an MD and an off-site, well-trained hospital or special hospital wing. The issue of interface with law enforcement-firefighters-medical care providers discussed subsequent to Sequoyah remains important. The issue of "which individuals responding from off site should be allowed through access control points" is even more important in an age of terrorism. The fluorine gas at the site, alone, is - like the better known chlorine gas - deadly. As you imply in the document, a Nuclear Fuel accident is more likely to be immediately deadly at a greater distance than a Nuclear Reactor accident. I emphasize immediately and greater distance. Both are deadly and need to be taken much more seriously than you have up until now.

"Ruptured ModeA 48Y Cylinder at Sequoyah Fuel's Corporatron Facility: Lessons-Learned Report NUREG-1198", p. 13-14 says:
3.1.4
The January 4, 1986 UF6 cylinder rupture incident occurred outside and upwind of the process and administration building. Uranyl fluoride and hydrofluoric acid fumes were swept into the process building ventilation system. Within minutes, the entire building became uninhabitable. With the exception of an emergency kit at one of the access road guard posts, access to virtually all emergency equipment was lost during the incident. Additionally, the one available emergency kit located at the guard post did not have adequate and appropriate equipment.

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First aid supplies, the site ambulance, radiological survey equipment, protective clothing, respiratory protection equipment, a source of water for decontamination and skin flushing (because of hydrofluoric acid contact) and essentially all communication equipment were lost, as well as the onsite radioanalytical laboratory. Also, employee emergency assembly areas (lunch room and break room) designated by the Radiological Contingency Plan were uninhabitable. Self-contained breathing apparatus were not readily available for employees leaving the plant areas through the noxious fumes.

In addition, with no offsite radio network and very limited telephone capability, local police could not recontact the facility for updates of the emergency status. Without communications to the plant, local police had difficulty in determining which individuals responding from off site should be allowed through access control points.

3.1.4.2 Recommendations

(1) Consider requiring a designated Emergency Operations Center (EOC) on site and an alternate EOC either off site or in another onsite location which is unlikely to be impacted by the incident. The EOC and alternate EOC should contain adequate communications capability and accommodations to provide for coordination of the onsite emergency response activities and notifications and coordination with offsite supporting organizations. The EOC or alternate EOC should be accessible 24 hours a day.

(2) Locations of emergency equipment and kits should be reviewed by the NRC and licensees so that in the event of an emergency in a given facility location, or inaccessibility of a large portion of the facility, access to adequate emergency equipment and facilities, including emergency decontamination facilities, can be assured. Equipment caches should be in multiple locations.

(3) Consideration should be given to providing strategically placed "air capsule escape units" to allow workers to escape from portions of a facility in which there exists a potential for exposure to toxic fumes for more than a few moments.

(4) The facility communications system should include a radio system compatible with local police or other offsite responder communications systems. In addition, the licensee should attempt to identify beforehand to local and state police, insofar as practical, offsite individuals who would be called on for support in the event of an emergency at the site. Radio communications with police officials during an emergency can resolve specific issues."
http://pbadupws.nrc.gov/docs/ML0700/ML070080302.pdf

You should delete your 21 uses of the word "credible". It is a loophole in your regulations as big as the universe.

While it is important, in the short-term, to have active pollution monitors operating on site at Nuclear Fuel facilities to prevent immediate poisoning of people nearby, in the long-term it is silly to monitor since you do so in concentrations of microcuries per milliliter rather than actual amounts. You are just flushing it elsewhere.

The NRC's Kevin Ramsey who submitted comment NRC-2015-0149-0003 should be fired.