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# PUBLIC SUBMISSION

**Docket:** NRC-2014-0240  
Mitigation Strategies for Beyond Design Basis Events

**Comment On:** NRC-2014-0240-0003  
Mitigation of Beyond-Design-Basis Events

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## General Comment

"(b) Integrated response capability. Each applicant or licensee shall develop, implement, and maintain an integrated response capability that includes:

(1) Mitigation Strategies for Beyond-Design-Basis External Events. Strategies and guidelines to mitigate beyond-design-basis external events from natural phenomena that result in an extended loss of all ac power concurrent with either a loss of normal access to the ultimate heat sink or, for passive reactor designs, a loss of normal access to the normal heat sink. These strategies and guidelines must be capable of being implemented site-wide and must include...."

The above stated condition addresses only loss of all AC. In Fukushima, The DC was also lost and most of the electrical switchgear including AC & DC was not in condition to be reenergized. DC- batteries are centrally located, usually 2 sets (Train A & B). These batteries are also susceptible for failure as a consequence of the severe accident. For, certain models of BWR, different voltage levels of safety power supply is needed for addressing a simple station black out (250V DC for valve operation and 125VDC for control and in certain cases 24V for indication) Unless a de-centralized DC power (appropriate DC supplies locally) for non-electric cooling systems (Diesel-driven/ steam driven pumps) the system operation cannot be assured under severe accident conditions. A reactor trip following a full power operation would require these

capabilities to be immediately available for preventing core damage.  
Therefore, assuming loss of AC power alone is clearly inadequate.