

As of: 2/12/16 9:01 AM
Received: February 11, 2016
Status: Pending_Post
Tracking No. 1k0-8nwr-sk47
Comments Due: February 11, 2016
Submission Type: Web

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

Document: NRC-2014-0240-DRAFT-0021
Comment on FR Doc # 2015-28589

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General Comment

1. The proposed rule and guidance for mitigation strategies hazard protection appear to establish inconsistent levels of protection for various hazards. The guidance discusses protection from high winds to the 1 million year event, and lower levels of protection from flooding and seismic events allowing some plants to provide marginal performance for a 10,000 year event. The rule and guidance allows for the design of mitigation strategies that provides minimal to no protection for events even slightly greater than a 10,000 year event. A common performance goals for mitigation strategies should be established to ensure plants can cope with a 100,000 year hazard events to complement the existing design basis framework for nuclear safety. Mitigation strategies should be more robust than existing safety equipment not less to provide effective defense-in-depth.
2. The proposed rule and guidance should include formal treatment of uncertainties associated with the reevaluated hazards. Consideration of uncertainties would inform the mitigation strategies to ensure they provide equal and creditable protection for nuclear plants.