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Assessment of Radioactive Discharges in Ground Water to the Unrestricted Area at Nuclear Power Plant Sites

Comment On: NRC-2015-0272-0002

Assessment of Radioactive Discharges in Ground Water to the Unrestricted Area at Nuclear Power Plant Sites; Request for Comment on Draft Regulatory Guide

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Comment on FR Doc # 2015-31254

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General Comment

The DG, entitled, "Assessment of Radioactive Discharges in Ground Water to the Unrestricted Area at Nuclear Power Plant Sites"

Page 2 the following is found: GDC 60, "Control of Releases of Radioactive Materials to the Environment," states, the nuclear power unit design shall include means to control suitably the release of radioactive materials in gaseous and liquid effluents and to handle radioactive solid wastes produced during normal reactor operation, including anticipated operational occurrences. Sufficient holdup capacity shall be provided for retention of gaseous and liquid effluents containing radioactive materials, particularly where unfavorable site environmental conditions can be expected to impose unusual operational limitations upon the release of such effluents to the environment.

Comment 1: It is most bothersome when radioactive contaminates are produced at all considering the devastation of past nuclear plant operations as well as testing. For that reason "Control of Releases of Radioactive Materials to the Environment," is a nonstarter & should not be allowed period. Today Feb.9 found the following evolving situation in New York <https://www.rawstory.com/2016/02/new-york-orders-probe-after-nuclear-plant-leaks-radioactive-water-north-of-the-city/>

New York orders probe after nuclear plant leaks radioactive water north of the city "Cuomo said in a statement the plant's operator, Entergy Corp, has informed him the contaminated water has not migrated off the site and poses no public health risk. " Though claimed by the operator that, "contaminated water has not migrated off the site," it is my assumption based on reading what is being proposed, this plant would be

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Call = T. Nicholson (TSN)
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allowed to discharge radionuclide laden waters into the area adjacent to this or any nuclear plant. Totally Objectionable.

Comment 2: The admission that beyond normal preventative "holdup capacity" which in & of itself should be the limit to anything allowable. A secondary provision is being established which allows a further intrusion of the lethal contaminate radionuclides' into the public underground water table is unacceptable. The following articles establish clearly of the past when undesirable levels of these same radioactive substance penetrated the entire Columbia River below Hanford including the Estuarial areas of the Columbia as well Willapa Bay, Wash.

Radioactive oysters in Willapa Bay, WA updated by Daniel (Mar 23, 2011)

<http://www.toxipedia.org/display/wanmec/Radioactive+oysters+in+Willapa+Bay,+WA>

"During the 1950's and 1960's, radioactivity from Hanford was found at high concentrations in shellfish in Willapa Bay at the mouth of the Columbia which extended for at least 200 miles into the Pacific Ocean. Beginning in 1959, zinc-59 levels in the oysters at Willapa Bay were being monitored. At that time, levels of zinc-65, a radioactive byproduct of plutonium production, in Pacific coast oysters were 300 times greater oysters from Japanese and Atlantic waters. In the 1960's a Hanford employee set off radiation alarms when he entered the Hanford Site. Upon investigation it was determined that he had become radioactive from eating a can of oyster stew that contained oysters harvested from Willapa Bay."

Additional Comment: Granted what happened in the above situation was resolved when those early version Type I reactors were phased out. However these new guidelines would create the possibility of such events reoccurring. The difference being a timeline for leakage would extend over 100's of years rather than direct impact as was the case in Willapa Bay oysters in 1959.