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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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## Submitter Information

**Name:** Linda Castillo

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## General Comment

The proposed rule does not fully address the improvements that are needed to be made to further enhance safety. The root cause of the accident was due to the total loss of all power systems (both AC and DC power systems). The current proposal does not consider the total loss of DC power nor AC power from inverters through station batteries. The rule does not relate the electrical power system enhancements to address the total loss of all AC Power leading to a station blackout. For example, it does not require a back-up power supplied by a portable diesel generator(s) to be made readily available to allow key instrumentation and control equipment and key electrical loads to remain operable. [Castillo-1] The rule also does not take into account the load shedding strategy to extend the existing station's battery life to ensure that the connection of portable generators can be completed before batteries are depleted. It doesn't take a proactive approach to ensure the availability of backup power. There needs to be an evaluation to determine if the batteries can be extended past 8 hours that may be needed to mitigate beyond design basis accident. A predefined time is required to be determined between the total loss of AC power and connection of additional power sources such as having readily available portable generator. [Castillo-2] Therefore, the most important initial assumptions the licensees need to consider for mitigating beyond design basis events such as in the Fukushima accident is the loss of all DC and AC power systems.

