PUBLIC SUBMISSION

As of: 6/26/18 10:46 AM
Received: June 21, 2018
Status: Pending_Post
Tracking No. 1k2-93un-pi34
Comments Due: June 21, 2018
Submission Type: Web

Docket: NRC-2018-0096
Biweekly Notice; Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving No Significant Hazards Considerations

Comment On: NRC-2018-0096-0001
Biweekly Notice; Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving No Significant Hazards Considerations

SUNSI Review Complete
Template = ADM-013
E-RIDS=ADM-03
ADD= Karen Zelenock
Kay Goldstein, Tara Inverso

Document: NRC-2018-0096-DRAFT-0001
Comment on FR Doc # 2018-10565

COMMENT (1)
PUBLICATION DATE: 5/22/2018
CITATION # 83 FR 23728

Submitter Information

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General Comment

I object to the relocation of the reactor core isolation cooling (RCIC) piping injection point from the reactor vessel head spray nozzle to the feedwater line using the residual heat removal (RHR) shutdown cooling return line for River Bend Nuclear Power Station. It was designed with a reactor vessel head spray nozzle for a reason - it was and is necessary. Just because "The vessel head spray function is no longer in use" https://www.nrc.gov/docs/ML1715/ML17153A286.pdf and a probe that was "sent through the reactor's primary reactor coolant system discovered a one foot long 'loose part' that has damaged a nozzle on the reactor pressure vessel" isn't a reason to pretend it is ok. It's not ok. It's also a no-brainer that the reactor vessel head spray is needed for reasons similar to why there are sprinklers in ceilings in public places. The River Bend Nuclear Power Station is a rare GE BWR-6/Mark III reactor, and the only one with its particular design and construction, as explained here: https://www.osti.gov/scitech/servlets/purl/6051208 Thus, it is unlikely that you understand the full repercussions of these changes.

I also object to "relocating specific surveillance frequencies to a licensee-controlled program with the adoption of Technical Specifications Task Force (TSTF) Traveler TSTF-425, Revision 3, Relocate Surveillance Frequencies to Licensee Control". The little oversight that the NRC provides is better than nothing, especially since it becomes part of the public record.

Risk is not merely an academic question at River Bend Nuclear Power Station, as there have been loss of cooling near misses and a variety of other problems in recent years.

A serious accident at River Bend nuclear power station would quickly turn into a combined nuclear and oil,

gas and chemical disaster, shutting down the lower Mississippi river system and ports and much of the US economy.