

SUNSI Review Complete  
 Template = ADM-013  
 E-RIDS=ADM-03  
 ADD=Eric Oesterie, Tam  
 Tran, Barbara Hayes

COMMENT (1)  
 PUBLICATION DATE:  
 12/20/2018  
 CITATION 83 FR 65367

<b>As of:</b> 1/16/19 9:07 AM <b>Received:</b> January 12, 2019 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1k3-97n7-c3em <b>Comments Due:</b> January 22, 2019 <b>Submission Type:</b> Web
--

# PUBLIC SUBMISSION

**Docket:** NRC-2018-0280

Virginia Electric and Power Company; Dominion Energy Virginia: Surry Power Station, Unit Nos. 1 and 2

**Comment On:** NRC-2018-0280-0001

Virginia Electric and Power Company; Dominion Energy Virginia: Surry Power Station, Unit Nos. 1 and 2

**Document:** NRC-2018-0280-DRAFT-0001

Comment on FR Doc # 2018-27547

## Submitter Information

**Name:** Erica Gray

**Address:**

406 Glendale Dr  
 Henrico, VA, 23229

**Email:** veggielady@yahoo.com

## General Comment

NRC-2018-0280

Re: Scoping of the Surry Power Station Environmental Review.

The environmental review can not be separated from the safety review. They are inextricably connected.. For example: The dominant and expected type of change in the reactor pressure vessel is embrittlement under neutron irradiation of the RPV, especially in the core (beltline) area.

If the embrittled RPV was to have a flaw of critical size and certain transients were to occur, the flaw could propagate very rapidly through the vessel, possibly resulting in a through wall crack and challenging the integrity of the RPV.

Thus becoming an environment issue.

As Surry NPP gets older, there is an increased probability of malfunctions and serious accidents occurring. The NRC and the nuclear power industry are aware of reactor pressure vessel embrittlement, irradiation assisted stress corrosion cracking of reactor internals, concrete structures and containment degradation and other components such as cables and buried piping, all associated with ageing.

Yet over the years the NRC has approved many relief requests, exemptions, amendments and changes to the original license for Dominion's operation of Surry unit 1 and 2.

All of this information must be compiled, reviewed and made public.

Furthermore, the subsequent license renewal of Surry NPP needs to be based on thorough site specific inspections and validated tests, not just by using the Generic Lessons Learned Report.(GALL)

Site specific data and corresponding tests that were done years ago are not adequate in considering an additional 20 years license extension. After all, Dominion is only 7 years into their first license renewal that expires in 2032/2033.

Also It appears that commitments made for the 1st license renewal still have not been completed and or fully met.

Yet the NRC has stated they expect to approve of subsequent license renewal for Surry NPP in 18 months. This is not acceptable.

This document just represents one relief request, out of many:

April 25, 2012

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)  
SURRY POWER STATION UNITS 1 AND 2  
ASME SECTION XI INSERVICE INSPECTION (ISI) PROGRAM  
REQUEST FOR ALTERNATIVE - IMPLEMENTATION OF EXTENDED  
REACTOR VESSEL INSERVICE INSPECTION INTERVAL  
RELIEF REQUESTS CMP-007 AND CMP-009

Dominion proposes to perform the fourth 10-year ISI interval examination of the Surry Units 1 and 2 RVs in 2023 and 2024 in lieu of 2013 and 2014, respectively. To support the alternate RV inspection interval of 20 years for Surry Units 1 and 2, Dominion requests approval of Relief Requests CMP-007 and CMP-009 by May 30, 2013.

<https://www.nrc.gov/docs/ML1213/ML12130A217.pdf>

The NRC needs to verify and validate that all the commitments made by Dominion for their current/1st license renewal are completed and that new inspections and tests are done to ensure the soundness and safety of both units prior to moving forward with a review for a subsequent license renewal.

Thank you,

Erica Gray