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# PUBLIC SUBMISSION

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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

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## Submitter Information

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## General Comment

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The thought of having the Surry reactors certified for another twenty years frightens me. This seems totally irresponsible and perhaps is just a formality to underwrite Dominion's stock performance instead of an honest scientific assessment. As we are only into seven years of the current twenty year renewal, this seems premature and highly speculative.

As I understand it, the required physical on site tests to support this extension till 2032 are still unfinished. Obviously your Generic Lessons Learned Report.(GALL) is a useful tool, but no replacement for any site specific inspection or testing of materials.

I am not a nuclear scientist and must rely on your experts to make these assessments, but it is clear in your documents, this is not happening in a timely manner. The Surry NPP is one of many unique installations with its own challenges. As a citizen observer, there are many questions I have about the situation of this facility and how they are being addressed.

Surry is situated on an island of marsh land in a confluence of brackish water, highly exposed to harsh weather conditions and a constantly evolving shoreline in an area that has seen drastic change over a short period of time. It is hard to imagine it is different there from the more populated points that are being subsumed periodically and some permanently. When projecting thirty two years into the future, that the site will remain up on dry land seems highly speculative.

Also the matter of corrosive brackish water could be a factor in the wearing of parts. Metals oxidize, concrete

absorbs moisture and releases it changing its character yearly, insulated wires and hoses subject to temperature extremes, moisture and rodents; so many things to evaluate constantly, but to project a safe future projected thirty years forward on extrapolation seems highly suspect. There is no way to do this, it is not reasonable to anticipate that data now will be consistent with real time change.

The biggest concern is the quality of the reactor vessel. This was engineered to have a life of forty years. When it was made, there was no data on how the metal would react to the stress of heat and corrosion in the presence of nuclear fuels. I understand there are samples that are pulled and inspected periodically. This would be a linear observation, but is there assurance there is not an exponential degradation that would create a danger of failure in doubling the length of service? This guess that it will remain sound for twice the length of prescribed time into the future is questionable.

Pre-qualifying this NPP for such a drastic period at this time seems irresponsible, and I would prefer any extension of service be delayed till there are more site specific physical inspections and testing over time.