

DUCKET NUMBER

PETITION RULE PRM 54-1
(65FR 42305)

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13

1952 Palisades Dr.

Appleton, WI 54915

Secretary US NRC

Comment on petition for
rulemaking PRM-54-1 by Union of Concerned Scientists

I found out about this petition and wrote NRC for
a copy Oct 16, & just received it. It is difficult for the
public to keep up on all these things. We don't read the
Federal Register Daily.

My main concern here is a big one for the whole
nuclear industry — Coldwigs and their application
and their degradation. It is of concern in
the nuclear plants as well as in dry cask storage.
It is clear from the petition references that Mr. ~~Delmon~~
report on Hatch revealed many "deficiencies" in
coatings. The reference to "gaps" in the coating
points clearly to "improper" application in the
1st place.

Improper application of a coating, as well
as the use of the wrong coating on a surface, can
cause huge problems as we saw in the hydrogen
explosion at Pt. Beach with the VSC-24 cask loading.
The improper coating here still has not been
replaced with something safer and it should be.
Now we have WELCO wanting to load 4 more of
these hazardous casks that have to keep the
"coating generated" by hydrogen from being set on
fire by welding sparks. Makes no sense.

Also we have Transatom with no solution as
to the messy application of a baked on
coating at T. r. on that flaked off and
clouded the pool water preventing Cook

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SECY-02

loading.) How this problem been solved?

Why did the Millstone radwaste tank rupture already in 1977?? Seems strange to me. Sundry corrosion control by coating needs further evaluation by NRC and the industry. It was clear from the VSC-24 fires that coatings had not been given the attention needed in past history and that corrosion control is in much need of attention in all areas.

I am very interested in the Manufacturers Director on that "one coat of red oxide primer 2-4 mils" that was put on carbon steel pipe embedded in concrete after sandblasting. (p14 of petition) Were coatings properly applied at plants in the 1st place? If not — these "gaps" are a real problem so plants eye and most certainly I am concerned, with U.C.S., that generic problems like those at Hatch carry over to plants like Pt. Beach. I know Hatch is Boiling Water, yet still there are many components in radwaste systems at plants dependent on very careful testing and monitoring of corrosion of radwaste systems. Aging degradation ^{evaluation} in a non-enforced NRC "communication" is not valid as safe for the public. We need more enforceable requirements — especially in any license renewal plan. A clear aging management program for liquid and gaseous radioactive waste systems is needed and that include the plant and dry cask storage loading (and unloading procedures especially, which do apply here). Thank you,
Jawn Shillingshaw