

# PUBLIC SUBMISSION

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 State-of-the-Art Reactor Consequence Analyses Reports

**Comment On:** NRC-2012-0022-0005  
 State-of-the-Art Reactor Consequence Analyses Reports

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## Submitter Information

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## General Comment

### Item 11

Problems with human performance are unrealistically AVOIDED in this report. (Ref. p. 19 of 133) There is no consideration that adequate staffing by knowledgeable people exists at the time of an accident, that command and control methods are adequate, or even that communication will be possible, other than by face to face.

### Item 12

On page 44 of 133 is a comment that flooding would be expected to result in delayed failures. At Fukushima Daiichi, DC power was lost for Unit 1-2 control room lighting within 51 minutes after the scram. Recall that the first tsunami arrived 41 minutes after the earthquake. That is not a delayed failure to me. (Ref. INPO Report 11-005, pages 8 & 3)

SUNSI Review Complete

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