

RESPONSE TO TASK FORCE RECOMMENDATIONS

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(NRDC)**

Recommendations 2.1 and 2.3 – Seismic/Flooding

NTTF's recommended reevaluation:

- is limited to seismic and floods, but should include all significant contributors to core damage frequency (from PSAs/SAMAs/PRAs), e.g., including:
 - internal and external fires
 - high winds and tornados
 - ice and storms
 - nearby facility and transportation accidents
- should address adequacy of existing siting criteria
- is overly reliant on licensee self-assessment
 - fails to insure that NRC establish/approve the inspection/evaluation criteria and methods for the reevaluations and walkdowns
- is overly reliant on existing design basis:
 - will have limited value until gap in seismic protections for new vs. existing plants is resolved (GI-199)

Recommendation 2 (cont.)

- The NRC Staff recommendations attempt to resolve some 2.1 and 2.3 issues related to the evaluation process and criteria.
- It would be preferable had the Staff recommended that once the above clarifications are addressed that the licensee be ordered to conduct the necessary walkdowns and appropriate reevaluations.

Recommendation 4 – SBO Coping

- Should include immediate extension of SBO coping capability to 8 hours given the 4.1 rulemaking will eventually require it.
 - Current regulations leave gap allowing a possible 2-hour coping time!
- Commission action should also ensure that both emergency on-site and off-site equipment be subject to the same maintenance, availability, training and inspection rules as apply to SSCs.

Recommendation 5 – Hardened Vents

- NRDC supports the NTTF recommendation, with the clear caveat that we do not believe that inclusion of “reliable” hardened venting of older BWR Mark I and II reactors *alone* is sufficient to render these obsolete designs adequately safe given the risk they pose to dense surrounding urban populations numbering, in some cases, in the several millions.
- The NRC Staff delay in addressing BWR Mark II reactors is unnecessary.
 - NTTF: “because Mark II containment designs are only slightly larger in volume... it can be reasonably concluded that a Mark II under similar circumstances would have similar consequences”

Recommendation 7 – Spent Fuel Safety

- The staff's omission of all SFP-related recommendations is objectionable.
- While heat load varies with time, we disagree with Task Force's claim that increased pool loads do not contribute to cooling issues:
 - The ability of the water in the pool to dissipate heat and resist boiling is proportional to its volume relative to the volume of spent fuel; these are adversely affected by the amount of spent fuel packed into the pool

Recommendation 7 (cont.)

- In the event of an accident or sabotage the source term for the spread of radioactive material is directly related to the amount of spent fuel in the pool.
 - Attention needs to be given to pool unloading and ways to reduce the hazards associated with spent fuel pools through accelerated dry cask storage.

Recommendation 8 – Emergency Response

- While agreeing with the NTTF recommended orders, NRDC believes that its primary orientation toward rationalizing paperwork and “guidance” does not go nearly far enough in ensuring that the NRC actually *accomplishes* its mission of *ensuring* that on-site emergency response capabilities *are adequate* to the task of protecting plant staff and the public and remain so on any given day decades into the future. We would prefer to see a much more hands on role by the NRC in establishing hard and fast performance criteria for emergency response capabilities and realistic methods for verifying on a recurring basis that licensees are able to meet them.

Recommendation 8 (cont.)

- NRDC disagrees with the NRC Staff recommendation to discard the orders and issue an advanced notice of proposed rulemaking.
- NRDC has already initiated a rulemaking for NTTF Recommendation 8.4
- The Staff recommendation makes the NTTF recommendation more vague.

Recommendation 9 – EP Enhancements

- NRDC agrees with NTTF recommendation
 - These regulatory gaps are obvious in their importance following Fukushima and never should have been allowed to evolve in the first place
- NRDC disagrees with NRC Staff recommendation to issue a request for information. The licensees can handle the NTTF's recommended order.

Recommendation 9 (cont.)

- Our concern with the treatment of emergency planning issues in the NNTF Report, and by NRC generally, is that risk reduction assessments are based on a cost–benefit analysis whereby the cost of a mitigation alternative is compared to the discounted mean of the collective dose (assessed at \$2,000/person-rem) and economic damage consequences after being weighted by core damage (and wind direction) frequency. No further consideration is given to limiting collective dose and economic impacts of lower-frequency high-consequence events, such as that which occurred at Fukushima, by requiring that reactors not be located in areas of high population density and high economic activity.