

UCS Perspective on the Japan Task Force Report Short-Term Actions

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General Comments

- **UCS endorses the need for swift and comprehensive action by the NRC to identify and eliminate safety vulnerabilities that have been highlighted by Fukushima**
- **Should be part of a larger review of the adequacy of safety margins and other defense-in-depth measures**

Orders

- **Orders are appropriate where swift action is warranted; the process for implementing them should be transparent**
 - **Should be as clear and specific as possible when issued**

How not to issue orders

- **NRC should avoid repeating the experience of the B.5.b order**
 - **Issued February 25, 2002**
 - **Final guidance not endorsed until December 22, 2006**
 - **Inspections not completed until December 2008**
 - **Open issues remained even in 2009**
- **Due in part to NRC-NEI disputes hidden from the public**

Recommendation 2

- **UCS agrees that near-term action is needed to define the current seismic and flooding risk profile and to address vulnerabilities**
- **GI-199 data, North Anna, Ft. Calhoun underscore concern**
- **Draft GL could provide a good evaluation basis, but timelines are too long and SMA/SPRA option could confuse the public**

Recommendation 4

- **UCS supports general framework for extended SBO mitigation but the ultimate level of protection will depend on resolution of many issues**
 - **Reliability and availability standards for coping equipment/procedures**
 - **Asserted seismic margins need to be demonstrated**
- **Credit should be given for B.5.b measures in severe accident scenarios only if they can be shown to work**

Hydrogen control in SBOs

- **The NRC should act immediately to require reliable backup power for hydrogen igniters at ice condensers and Mark IIIs to prevent containment rupture under SBO conditions**
- **In fact, in 2006 the Commission directed the staff to “promptly proceed to require” these measures. It never happened and they remain voluntary commitments. Why?**

Recommendation 5

- **UCS supports requirements for reliable hardened wetwell vents for Mark I and Mark II BWRs**
 - **Operability under a range of severe accident conditions must be demonstrated**
- **No need to wait for final Fukushima vent analyses to proceed**

Recommendation 7

- **UCS supports prompt action to address the safety issues posed by overstuffed spent fuel pools**
- **The staff does not provide adequate justification for deferring action on important Task Force recommendations such as requiring reliable pool instrumentation**
- **Rulemaking to require accelerated transfer of spent fuel to dry casks should be a near-term action**

Recommendation 8

- **Strengthening and integration of EOPs, SAMGs, EDMGs are overdue**
- **Proposed requirements that EDMG procedures be developed and integrated into plant procedures were opposed by NEI and omitted in the final 50.54(hh) rule and guidance**
- **10/2006 letters: staff expectation that licensees would integrate B.5.b into procedures for effective use in nonsecurity-initiated events**

Recommendation 8

- **“The implementing procedures for B.5.b ... are not linked to the EOPs... B.5.b procedures are similar to fire safe-shutdown procedures in that they are stand alone and if you try to run them concurrently there may be conflicts ...” --- e-mail from Christopher Cahill, RI, 6/11/10**

Recommendation 9

- **UCS agrees with all Task Force recommendations for emergency planning enhancements but believes the Task Force defense of the 10-mile EPZ is premature**
 - **Fukushima experience needs to be fully assessed**

Acronyms

- **EDMGs: Extensive Damage Mitigation Guidelines**
- **EOPs: Emergency Operating Procedures**
- **EPZ: Emergency Planning Zone**
- **GI: Generic Issue**
- **GL: Generic Letter**
- **NEI: Nuclear Energy Institute**

Acronyms (cont.)

- **SAMGs: Severe Accident Mitigation Guidelines**
- **SBO: Station Blackout**
- **SMA: Seismic Margin Assessment**
- **SPRA: Seismic Probabilistic Risk Assessment**
- **UCS: Union of Concerned Scientists**