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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

ATTN: Rulemakings and Adjudications Staff

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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TO THE NUCLEAR REGULATORY COMMISSION:

Westinghouse's AP1000 reactor is the first new design in decades being considered for construction in the U.S. It is the design that has already been selected for construction with federal loan guarantees by utilities in Georgia and South Carolina. Though questions linger about the design's safety, and the NRC has not conducted additional analysis of the ongoing Fukushima disaster in Japan, the NRC appears to be sticking with its notorious nuclear industry-driven, fast-track licensing approach that undermines public health and safety.

I am writing to ask NRC to stop the Westinghouse AP 1000 certification process until it has considered the multitude of lessons about reactor design and operation which will eventually be learned from the Fukushima accident. Failure to do so will be a recipe for a nuclear disaster here in the U.S.

Nuclear engineer Arnie Gundersen of Fairewinds Associates analyzed the design of the AP1000 reactor and found many serious safety issues, saying that company analyses of the reactor's containment structure "are not based upon sound scientific analysis and engineering review, but appear instead to be based upon the mythical dreaming of an aggressive industry and its captive regulator." Gundersen's concerns include the passive cooling system of the AP1000 and lack of a robust containment shell. The cooling of the 1.75-inch steel containment shell is dependent upon a vulnerable 800,000-gallon tank precariously perched on top of a vented "shield building," a structure whose integrity has been questioned by even the lead NRC engineer in the design review. The Fairewinds report states: "This single source of cooling water perched atop the shield building is unique to the AP1000 design and Westinghouse's reliance upon it creates a single point of vulnerability that has not been thoroughly evaluated by industry regulator NRC due to the rush to AP1000 certification and licensure."

Westinghouse's Dr. Susan Sterrett also raised numerous, still unanswered, questions about the methodology employed by both Westinghouse and the NRC in relation to the AP1000 design, alleging Westinghouse improperly based the AP1000 design on aspects of the AP600 design and that the NRC and the Advisory Committee on Reactors Safeguards (ACRS) did not thoroughly review this choice by Westinghouse.

Please suspend certification of the Westinghouse AP1000 reactor design until these, and all other, public safety risks and lessons of Fukushima have been fully addressed.

Respectfully submitted, AJ Wolff

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