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Entergy Nuclear Operations, Inc.; Pilgrim Nuclear Power Station; Extension of Public Comment Period

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Comment on FR Doc # 2014-23934

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Submitter Information

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Submitter's Representative: Karen Vale
Organization: Jones River Watershed Association

General Comment

RE: Docket ID NRC-2014-0202; The NRCs consideration of an amendment to Facility Operating License No. DPR-35, issued to Entergy Nuclear Operations, Inc., for operation of the Pilgrim Nuclear Power Station.

On behalf of Jones River Watershed Association, please accept the following comments regarding amendment to Entergy Nuclear Operations, Inc.s operating license (No. DPR-35) for Pilgrim Nuclear Power Station in Plymouth, Massachusetts. These comments support those submitted to the NRC by Pilgrim Watch and the Town of Duxbury Nuclear Advisory Committee (NAC) on October 24, 2014 we concur with Pilgrim Watch and Town of Duxbury NAC's comments.

Insufficient Information: It is premature for the NRC to grant Entergy's licence amendment request because Entergy has not provided necessary documents in response to NRCs September 26, 2014 RAI so that the public can make informed comments. Entergys response to the NRCs September 26, 2014 RAI withholds necessary information (claiming Proprietary Information), which makes it difficult if not impossible for the public to make meaningful, informed comments on the issue.

Meaningless Public Participation: Entergy has already removed the energy absorbing pad and installed the leveling platform before public comments have been received and a potential public hearing.

NRC RAI Question 2 (Seismic Events) Insufficient Response: Entergy did not meet the regulatory requirements for disclosures and withheld seismic analyses needed for the public to make informed comments about the probability or consequences of an accident (previously evaluated or newly created by the amendment). Entergys seismic analysis should be disclosed so that the public learns whether the design basis seismic event is based on

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Call = T. Morgan (NSM)

the most current analysis of the risk in this area, since the newly evaluated seismic risk for Pilgrim is larger than the reactor is designed to withstand. Because the required post-Fukushima reassessment of Pilgrims vulnerability to earthquakes will not be completed until 2017, it is premature to grant approval.

RAI Question 4 Insufficient Response: A single failure proof crane may decrease the probability of a drop, but does not guarantee that it wont. Entergy also does not explain why it could not re-install a pad after the platform was in place in order to provide added protection.

Acts of Malice and Human Error: There is no information concerning whether acts of malice of human error were accounted for in Entergys analysis of the single failure proof crane upgrades or of the removal of the energy absorbing pad and installation of a leveling platform.

Potential Off-site Release: There are many unanswered questions, including whether the consequences of a load drop accident that does not involve exhaust through charcoal filters were analyzed? For example, were load drop accidents analyzed that penetrate the floor and could simultaneously initiate an accident and disable equipment necessary to mitigate the accident?

Shutdown during transfer: We believe the NRC should require Entergy to shut down Pilgrims reactor during transfer operations as an added measure of safety.