

UCS Perspective on the Prioritization of NTTF Recommendations

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Recommendation 3

- **UCS questions the staff proposal to designate “protection from concurrent related events” a Tier 3 issue**
- **Seismic PRAs developed for 2.1 will be deficient if risk-significant seismically induced concurrent phenomena are not identified or evaluated**

Recommendation 4

- **For 4.2, current 50.54(hh)(2) measures will require significant enhancements in order to provide assurance of effectiveness in prolonged SBO**
- **From B.5.b Phase 2&3 guidance:**
 - **Portable pump for SFP/core makeup only requires 12 hours of fuel and water supply**
 - **“not to be treated as safety-related equipment ... not subject to any new special treatment requirements ... (QA, seismic, EQ, etc.”**

Recommendation 4

- **Enhancing equipment, planning and training to cope with multiunit events is essential – should not wait for completion of SAMG/EDMG rulemaking**
 - **Fukushima Daiichi timeline has revealed how interactions between adjacent reactors affected emergency measures**
 - **Impact of aftershocks, obstructions, radiological conditions must be assessed**
- **Tabletops and drills for a range of scenarios should be conducted**

Recommendation 6

- **UCS maintains that strengthened hydrogen mitigation requirements, especially for ice condensers and Mark III containments, could and should be implemented quickly**
 - **Licensees have already implemented voluntary measures**
- **In contrast, NRC staff has demoted this to a Tier 3 issue**

Recommendation 7

- **UCS endorses the staff's assignment of 7.1 (reliable SFP instrumentation) as a Tier 1 issue**
- **Effectiveness and safety of prolonged SFP makeup needs further evaluation**
- **UCS endorses the proposal to consider “transfer of spent fuel to dry cask storage” as a potential priority issue**
 - **NRC should make public technical information on SFP fire risk needed to support conclusions**

Recommendation 8

- **Staff's proposed timeline does not address this issue with the required urgency**
- **Will need an additional near-term component to facilitate interim reliance on 50.54(hh)(2) measures**

Recommendation 9

- **UCS supports reassessment of EPZ size and KI distribution policy as a priority issue**

“Skill Set” Availability

- **“So it is going to take longer than the one to two years to get the information, do the analysis ... to be able to make an informed decision on whether you need to do anything different.” Tony Pietrangelo, NEI, 9/21/11**
- **The lack of availability of skilled personnel to perform detailed technical assessments should not be a reason to delay safety enhancements**
- **If necessary, conservative safety margins should be set now; detailed analysis can be used later to reduce conservatism**

Acronyms

- **EDMGs: Extensive Damage Mitigation Guidelines**
- **EPZ: Emergency Planning Zone**
- **NEI: Nuclear Energy Institute**
- **PRA: Probabilistic Risk Assessment**
- **SAMGs: Severe Accident Management Guidelines**

Acronyms

- **SFP: Spent Fuel Pool**
- **SBO: Station Blackout**
- **UCS: Union of Concerned Scientists**