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Emergency Onsite Response Capabilities

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USNRC

Comment On: NRC-2012-0031-0002
Onsite Emergency Response Capabilities

June 14, 2012 (8:45 am)

Document: NRC-2012-0031-DRAFT-0011
Comment on FR Doc # 2012-09336

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General Comment

1. It might have to be clarified in Section III.C that a principal regulatory approach for EDMG is to prevent, protect, or mitigate beyond design-basis accidents.
 2. In relation to the phrase of "Loss of Large Area (LOLA)" referred to in Sections III.C and IV.A, does this correspond to only a single unit or can it be also applicable to multiple units at a site? If LOLA is applicable to multiple units, what is the scope of boundary condition on the applicability of an EDMG where multiple units are located?
 3. In connection with EDMGs in a multiunit site, it might have to be clarified whether an EDMG should be developed individually for each unit or could be shared between two similar units.
 4. In case of an extreme natural disaster, several units in a multiunit site might suffer considerable damage. Hence, a hierarchical command and control process will have to be established in advance for effective implementation of EDMGs in coping with such events.
 5. We view that a way should be devised to evaluate the risk level or severity for extensive damage accidents at a site of multiple units.
 6. In connection with the question of "What additional scenarios or accident plans should be considered for addition to SAMG technical guidelines as a result of the lessons learned in Japan?", it may have to be first recognized that most EOPs at present do not address accident situations at shutdown states. Therefore, we view that additional scenarios or accident plans must be prepared for the period of shutdown states when the present EOPs are not valid.
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Attachments

Comments_on_NRC_RIN_3150-AJ11

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Comments on “Onsite Emergency Response Capabilities”

Docket ID NRC–2012–0031

Moon-Hak Jee, Ph.D.

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I am working for the Central Research Institute (CRI) of Korea Hydro Nuclear Power (KHNP) Company in the Republic of Korea. In the aftermath of the Fukushima accident, we have been closely watching the relevant NRC activities, initiatives and follow-up measures. Especially in recognition of the need for developing Extensive Damage Mitigation Guidelines (EDMG) among others, the KHNP plans to develop EDMGs for every nuclear power plant in Korea as a way to enhance emergency response capabilities.

I would like to issue some comments in connection with the questions raised in “IV. Discussion and Request for Public Comment” of RIN 3150-AJ11 (Docket ID NRC–2012–0031).

1. It might have to be clarified in Section III.C that a principal regulatory approach for EDMG is to prevent, protect, or mitigate beyond design-basis accidents.
2. In relation to the phrase of “Loss of Large Area (LOLA)” referred to in Sections III.C and IV.A, does this correspond to only a single unit or can it be also applicable to multiple units at a site? If LOLA is applicable to multiple units, what

is the scope of boundary condition on the applicability of an EDMG where multiple units are located?

3. In connection with EDMGs in a multiunit site, it might have to be clarified whether an EDMG should be developed individually for each unit or could be shared between two similar units.
4. In the case of an extreme natural disaster, several units in a multiunit site might suffer considerable damage. Hence, a hierarchical command and control process will have to be established in advance for effective implementation of EDMGs in coping with such events.
5. We view that a way should be devised to evaluate the risk level or severity for extensive damage accidents at a site of multiple units.
6. In connection with the question of “What additional scenarios or accident plans should be considered for addition to SAMG technical guidelines as a result of the lessons learned in Japan? “, it may have to be first recognized that most EOPs at present do not address accident situations at shutdown states. Therefore, we view that additional scenarios or accident plans must be prepared for the period of shutdown states when the present EOPs are not valid.

Rulemaking Comments

From: Gallagher, Carol
Sent: Thursday, June 14, 2012 8:21 AM
To: Rulemaking Comments
Subject: Comment on Proposed Rule - Onsite Emergency Response Capabilities
Attachments: NRC-2012-0031-DRAFT-0011.pdf

Attached for docketing is a comment from Moon-Hak Jee on the above noted proposed rule (77 FR 23161; April 18, 2012) that I received via the regulations.gov website on June 14, 2012.

Thanks,
Carol