

## SECYLettersCEm Resource

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**From:** Art C [art.in.vt@gmail.com]  
**Sent:** Friday, March 01, 2013 9:29 AM  
**To:** NRCExecSec Resource  
**Subject:** Require radiation filters on vents

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Chairwoman Allison M. Macfarlane  
Commissioner Kristine L. Svinicki  
Commissioner William D. Magwood IV  
Commissioner William C. Ostendorf  
Commissioner George Apostolakis  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

We urge you, the Commissioners of the Nuclear Regulatory Commission, to affirm the NRC staff's post-Fukushima recommendation to require engineered radiation filters on hardened containment vents at all 31 GE Mark I and Mark II nuclear reactors in the U.S. The health and welfare of New England residents who would be affected by catastrophic releases from Vermont Yankee or Pilgrim nuclear generating stations (as well as the public at 29 other Mark I and Mark II units) are more important than any costs associated with the overdue upgrades to these inherently inadequate and failure prone reactor containment systems.

Background: \*

In 1989, the NRC requested that all Mark I BWR (Boiling Water Reactors) owners voluntarily install hardened containment vents. The same retrofit installed on Fukushima Dai-Ichi dramatically failed on units 1, 2 and 3 in March 2011; In March 2012, the NRC ordered all Mark I and II BWR owners to upgrade these hardened containment vents - without consideration of a severe reactor accident advancing to reactor core damage. In the event of core damage, the public is not adequately protected by these hardened containment vents lacking filters . The NRC will not be serving the American public health and safety well if it takes a decade or more to haggle and negotiate with industry. The NRC must get it right now and issue Orders for prompt enforced industry action to install filtered containment vents. If justice delayed is justice denied, filters delayed is public safety denied.

For more information: see Union of Concerned Scientists white paper at link below.

Excerpt:

"Safety studies performed since the 1980s consistently concluded

that accident sequences most likely to require venting the containment involve loss of electrical power and compressed air. So, the hardened containment vents would work during accidents, unless the accidents happened."

And: "...while gases released from nuclear power plants during normal operation and during design basis accidents must, by NRC mandate, be filtered, the gases released during more serious accidents are not filtered."

"So, when the radioactivity level to be released is as high as it ever gets, the absolute least amount of protection against it is provided (Figure 4). That's indefensible – and all too simple to remedy."

See more at link below, by:

\*David Lochbaum, Union of Concerned Scientists

<http://allthingsnuclear.org/to-filter-or-not-to-filter-that-is-the-question-with-only-one-sane-answer/>

Thank you for taking appropriate safety action on this.

Arthur E. Coates

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