

# PUBLIC SUBMISSION

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Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving Proposed No Significant Hazards Considerations and Containing Sensitive Unclassified Non-Safeguards Information and Order Imposing Procedures for Access to Sensitive Unclassified Non-Safeguards Information

**Comment On:** NRC-2015-0092-0001

Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving Proposed No Significant Hazards Considerations and Containing Sensitive Unclassified Non-Safeguards Information and Order Imposing Procedures for Access to Sensitive Unclassified Non-Safeguards Information

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## Submitter Information

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## General Comment

"Applications and Amendments to Facility Operating Licenses and Combined Licenses Involving Proposed No Significant Hazards Considerations and Containing Sensitive Unclassified Non-Safeguards Information and Order Imposing Procedures for Access to Sensitive Unclassified Non-Safeguards Information" ID: NRC-2015-0092-0001

It is criminal that you hide something as important as Pressure Temperature curves and changes under "no significant hazards". You can't get more significant than reactor pressure vessel failure.

TENNESSEE VALLEY AUTHORITY (TVA), DOCKET NO. 50-296, BROWNS FERRY NUCLEAR PLANT (BFN), UNIT 3, LIMESTONE COUNTY, ALABAMA

In 1998 ORNL stated: "The P-T operating envelope for a RPV is progressively restricted because of adjustment of the P-T curve to accommodate the effects of irradiation embrittlement of the RPV material." ORNL/CP-100102 Evaluation of Margins in the ASME Rules for Defining t P-T Curve for a RPV, by T. L. Dickson, W. J. McAfee, W. E. Pennell, and P. T. Williauw Oak Ridge National Laboratory

Embrittlement in nuclear reactors hasn't gotten better, it has only gotten worse over the course of the last 17 years. Reactor Pressure Vessel embrittlement will eventually lead to catastrophic failure

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and soon. You can play with your statistically insignificant, flawed, data all that you please, but it doesn't change the material facts. You can write all of the computer programs you want to prove what you want to prove but it changes neither the facts nor the consequences of catastrophic failure which will make most of North America uninhabitable and create health care needs and costs with no one to bear them.

These old TVA reactors need to be shut down. You will argue that this is beyond the scope of this comment period but it is not. It is the real topic. The topic is that you want to adjust the Pressure Temperature Curve in order to justify the continued operation of this and the other old nuclear reactors. In particular, the Brown's Ferry nuclear power station has had all sorts of problems since almost the beginning.

The TVA belongs to the Federal government and hence to the taxpayer. Through Price Anderson and through Medicaid-Medicare the taxpayer will end up paying far more for a disaster at Brown's Ferry than it makes from it.

That is, of course, assuming that your only ethics is money. Even leaving aside social ethics of the health impacts on the public and environment, it's bad economics.

It doesn't take long to understand your nuke-speak lies. I think that the reactors have already had license extension and are being allowed to operate past their shut-down date. And, you are aiming to justify it with a Pressure Temp curve which matches what you want to prove.

The only thing you have succeeded in proving is that nuclear "sciences" have special rules which do not match reality nor the scientific method. You are not supposed to extend operations of these old reactors without proving they are safe. You cannot prove what is false. It is not science to approve the extended operation and then manipulate statistically insignificant data to "prove" that a new Pressure Temp curve is ok.

TENNESSEE VALLEY AUTHORITY, DOCKET NOS. 50-259, 50-260, AND 50-296,  
BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2, AND 3, LIMESTONE COUNTY,  
ALABAMA

Thank you for reducing the pressure at these reactors. This is testimony to the fact that there is a problem with these old brittle reactor pressure vessels, however. What is this reduction based on? Probably pretense that these are brand-new? The Belgian reactors are testimony to how little is known about the impacts of radiation, pressure and time on the reactor pressure vessels. Experts who have worked for the nuclear industry, including Dr. Digby MacDonald, have said that the computer models do not work. And, you are not even using enough data points and the scatter is all over the place, meaning your model is the BS which anyone who follows the NRC comes to expect.

If you do not start doing right you will be shut down and put on trial for crimes against humanity and the environment. It's just a matter of if a nuclear disaster happens first. Obeying your supervisor wasn't an excuse in Nazi Germany. It won't be an excuse here either. And, it won't be an excuse before God, when you die. You believe in reincarnation? Only black mold can survive high levels of radiation. So, you will reincarnate as black mold on a radioactive earth.