

PUBLIC SUBMISSION

As of: 7/16/15 2:53 PM
 Received: July 13, 2015
 Status: Pending_Post
 Tracking No. 1jz-8jyo-5bvl
 Comments Due: July 13, 2015
 Submission Type: Web

Docket: NRC-2015-0149
 Fuel Cycle Oversight Process

Comment On: NRC-2015-0149-0001
 Fuel Cycle Oversight Process; Request for Comment

Document: NRC-2015-0149-DRAFT-0003
 Comment on FR Doc # 2015-14288

6/11/2015

80 FR 33303

(3)

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General Comment

As a public stakeholder living in California, I sustain an active ongoing interest in many NRC documents released for public review, including Fuel Cycle Oversight Process. In most cases. I find items being reviewed reflect the nuclear industry perspective mostly, especially in terms of project feasibility, projected risk levels, adequacy of public safety margins and mitigation measures to prevent accidents from occurring. It appears common that independent external oversight of NRC staff's work, or progression of evolving science by experts outside the nuclear industry is often not solicited, prior to documents being released for public comment.

Over years, I am gradually developing a fairly technical learning curve from examining many NRC support documents, since I am always eager to learn new technical skills. It doesn't seem at all unusual when NRC staff generally applies deference, (or little critical analysis) on submittals of technical studies, or analyses prepared by Licensee consultants, or compliance reports (self reporting) on plant performance, or system, equipment adequacy. Typically, NRC relies on materials prepared by Licensee, using specific consultants, and/or contractors hired by Licensee, to perform work on projects proposed by reactor Licensees in United States.

That observation statement is meant to emphasize the overriding importance of public interest, and reinforce public's right, and expectation that all best industry practices are applied in development of each proposed project, including analysis of credible alternatives. As the nuclear industry's only regulating agency, it is duty of NRC to ensure that projects defined by Licensees fully meet mandated standards for public health and safety. The only essential component that seems

E-RTDS = ADH-03
 Qcd = A. Smirh (AXS00)
 SWSF Review Complete
 Template = ADH-013

important, and conspicuously 'missing in action' is accountability.

I noticed that in technical analysis or reports, in this specific case, calculation formulas used to define risk categories relies on mostly unverified assertions by Licensee's consultants, that several worst case scenario events are 'so unlikely, or implausible' that it is unnecessary to define most extreme possible precautions, such as evacuation and/or shelter in place, or define any but least restrictive 'alert levels'.

These are the type of unverifiable assertions I find disturbing that NRC typically accepts from Licensees, even though recent practical evidence from 'unexpected' accidents at TMI, Chernobyl, and Fukushima, where severe but unexpected events actually occurred. Whenever NRC analysts assert risk categories on accident probabilities are defined technically as being a possibility, however such a small probability that 'it is not cost effective to design, or develop programs or planning for extreme emergency events, such as evacuation, or shelter in place.' that seems like an obvious signal that critical evidence is missing, Public stakeholdres deserve vital proof that safety margins are met -- that additional layer of 'assurance' and verifiable proof is missing.

Within past decade, public stakeholders observe how NRC defines agency priorities in ways that are more business-friendly to nuclear industry. In all cases, NRC has unique authority it rarely applies, to critically examine Licensee submittals and to Request Additional Information (RAI). Instead, it seems in most steps, NRC usually takes lenient positions when marginal cases may require application of some level of discretion. NRC staff usually opts to make every effort NOT to require any extra steps, or apply any additional requirments from Licensees. This seems common when existing NRC regulations have either become obsolete, or important Rulemakings have not yet occurred (such as the area of Decommissioning). In cases where that type of 'NRC discretion exists', PUBLIC STAKEHOLDERS DESERVE, AND EXPECT NRC TO FULLY APPLY IT.

Public deserves, and expects technical materials in Licensee's supporting documents to reflect verifiable evidence, relevant technical skill, evidence of Licensee contractors holding all necessary certificates to demonstrate most current, and up to date skills training, expertise, and experience to qualify one to perform expert level analysis, and provide a level of certainty to provide reasonable assurances of performance, capability of systems/materials of sustaining structural integrity, and specific technical performance capabilities.

Having read technical materials supporting NRC's notice on "Fuel Cycle Oversight Process; Request for Comment" please accept my comments as non-licensed individual, one of millions of public stakeholders, where 'all of us' have substantial 'skin in the game', especially in terms of short and long term public health and safety.