



SIERRA CLUB

VIRGINIA CHAPTER

Sierra Club Virginia Chapter
422 East Franklin Street, Suite 302
Richmond, VA 23219

November 1, 2016

Stephen G. Burns, Chairman
U.S. Nuclear Regulatory Commission
Mail Stop O-16G4
Washington DC 20555-0001

Dear Chairman Burns,

The Sierra Club Virginia Chapter is disappointed that the Economic Simplified Boiling-Water Reactor (ESBWR) Subcommittee of the Advisory Committee on Reactor Safeguards has signed off on the Combined Operating License (COL) application for Dominion's North Anna 3 reactor. We understand that the COL application now goes to the full Advisory Committee on Reactor Safeguards which meets on November 3, 2016.

Before that meeting we want to register our strong objections to a Combined Operating License for the North Anna 3 reactor. There are numerous departures and exemptions from the Design Control Document (DCD) that raise serious concerns about the safety of this project.

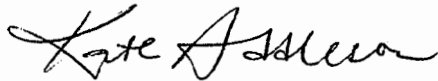
In view of those numerous departures, exceptions and changes to the Design Control Document, the Sierra Club Virginia Chapter has serious concerns about whether an ESBW Reactor is suited for the North Anna site and therefore whether the COL application should be approved. In particular, the inadequate analysis of earthquake risks should be a red flag to the NRC. Another reactor in proximity to an active earthquake fault results in the increased risk of a catastrophic event that could threaten our Nation's capital, not to mention closer residents and population centers.

In addition to our concerns related to risks associated with earthquakes, we continue to have questions related to steam dryer safety. Early in the design review process, GE Hitachi made false statements to the NRC and Department of Energy about the steam dryer unit of the advanced nuclear ESBWR. A steam dryer removes liquid water droplets from steam produced by the nuclear reaction that generates electricity in boiling-water type reactors. The NRC requires GE Hitachi to demonstrate that vibrations caused by the steam dryer will not result in damage to a nuclear plant. GE Hitachi concealed known flaws in its steam dryer analysis and falsely represented that it had properly analyzed the steam dryer in accordance with applicable standards and had verified the accuracy of its modeling using reliable data. These

misrepresentations resulted in a \$2.7 million fine levied against GE Hitachi by the U.S. Justice Department.ⁱ Despite these irregularities, the NRC certified ESBWR design in October 2014.ⁱⁱ

We urge the Advisory Committee on Reactor Safeguards to consider these concerns in their review. Should the Advisory Committee on Reactor Safeguards approve the COL application for Dominion's North Anna 3 reactor, we urge the Nuclear Regulatory Commission to reject this application.

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Addleson". The signature is fluid and cursive, with the first name "Kate" written in a larger, more prominent script than the last name "Addleson".

Kate Addleson, Director
Sierra Club Virginia Chapter

ⁱ <https://www.justice.gov/opa/pr/general-electric-hitachi-nuclear-energy-americas-agrees-pay-27-million-alleged-false-claims>

ⁱⁱ <http://www.nrc.gov/reactors/new-reactors/design-cert/esbwr.html>

CHAIRMAN Resource

From: Kate Addleson <kate.addleson@sierraclub.org>
Sent: Tuesday, November 01, 2016 3:38 PM
To: CHAIRMAN Resource
Cc: Seth Heald
Subject: [External_Sender] North Anna 3 Reactor Combined Operating License
Attachments: NA3_NRC_letter_11.1.16.pdf

Dear Chairman Burns,

Please find a letter from the Sierra Club Virginia Chapter enclosed noting our strong objections to the Combined Operating License for the North Anna 3 reactor.

Thank you for your attention to this matter.

Sincerely,
Kate Addleson

Kate Addleson
Director
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