

Public NRC Meeting

License Renewal for 100 years of Plant Operation, Technical Issues for Civil Structures and Concrete

A Researcher's Point of View

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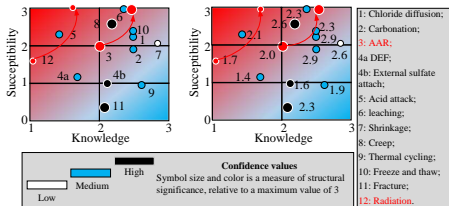
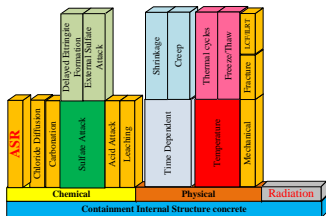
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- 1 A: Should the NRC develop guidance?
- 2 B: Technical issues
- 3 C: Approaches
 - Lessons Learned by VES
 - Recommendations
- 4 Background

- My guess is that there will be a strong push from industry (and possibly from the NRC) for such an extension.
- Short answer: **Yes**. If the Pentagon has contingency plans to attack Canada, then the NRC should develop properly crafted contingency documents for a 100 years operation, as soon as possible.
- Note:
 - Keep in mind that there is a **time lag between scientific knowledge and engineering codes**.
 - To the best of my knowledge no other country is making such a **bold move**, not even for 80 years
 - Let us always keep in mind that those reactors were **designed with 40+ year-old technology** for 40 years (not 60, 80, let alone 100).
 - Since then **much has been learned about aging, seismic, and safety**. We can not ignore those developments.



- Technical issues have been addressed (for 80 years of operations) by *NUREG/CR-7153, Vol 4 Expanded Materials Degradation Assessment (EMDA) Volume 4: Aging of Concrete and Civil Structures (2014)*¹
 - Two sites have been affected (as far as I know) by ASR:
 - Seabrook: Containment building
 - North Anna: Transmission towers
 - Biggest issues (2021) & both cause swelling
 - **AAR** Containment building
 - **Radiation** Reactor vessel
- Within a 100 years operations, likely to be many more.

¹ I was a member of the panel

First, lessons learned from my **personal involvement** with Crystal River and Seabrook²

- NRC has not regulated, but commented on documents submitted by industry
- Minimal technical input from regulator
- Absence of well known NRC experts (such as Herman Graves, Dan Naus or Abdul Sheikh)
- No panel reviews
- What is the point in having knowledge (per previous slide) if it is not applied and we remain **shackled by 40 years old design codes!**
- Administrative/bureaucratic considerations prevailed over best possible (and reasonable/achievable) safety.

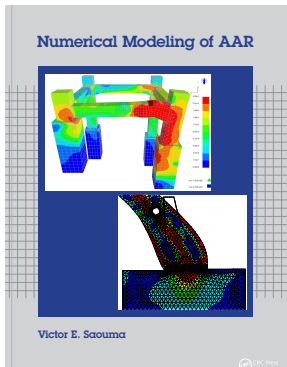
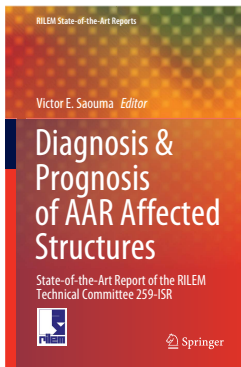
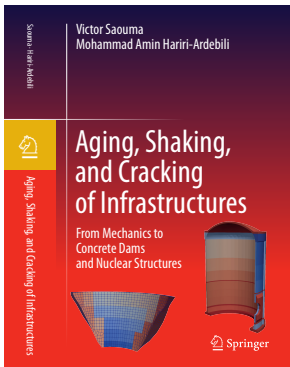
This paradigm should be avoided in its entirety. This is now an entirely **new ball game**

²This is **relevant** as it is indicative as to how the NRC seems to have addressed technical challenges related to **Beyond Design Basis**

The NRC should:

- 1 Safety and not \$\$ utmost priority
- 2 Science first, Engineering second
- 3 Develop regulation itself and not subcontract task to industry or EPRI.
- 4 Convene panel of experts and revisit the 2014 EMDA.
- 5 Fund and adopt research (laboratory tests and simulation tools) when needed, and results should be implemented in regulations
- 6 Convene technical panels, perform peer reviews
- 7 Forget original design codes for operation or aging management, enforce compliance with most recent ones, and prioritize scientific knowledge over design codes
- 8 Tighten Aging Management Program
- 9 Should be a collaborative effort between Scientists, Engineers, Regulators, & Utility Companies.

and maintain its worldwide leadership in nuclear safety.



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