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Notice of Intent to Conduct Scoping Process and Prepare Environmental Impact Statement NextEra Energy Point Beach, LLC; Point Beach Nuclear Plant, Unit Nos. 1 and 2

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Notice of Intent To Conduct Scoping Process and Prepare Environmental Impact Statement; NextEra Energy Point Beach, LLC, Point Beach Nuclear Plant, Units 1 and 2

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General Comment

(Beyond Nuclear, public comment #7, Pt.1)

Please consider these two articles, from mid-2012, published by Citizens Nuclear Information Center-Tokyo, re: reactor pressure vessel (RPV) neutron embrittlement and pressurized thermal shock risk at Japan's worst embrittled RPV, Genkai Unit 1:

<<https://cnic.jp/english/?p=2653>>

and

<<https://cnic.jp/english/?p=2654>>

They are entitled/dated: "Aging Nuclear Power Plants, focusing in particular on irradiation embrittlement of pressure vessels," NukeInfo Tokyo #148, published May 11, 2012, and continued in NukeInfo Tokyo #149, published July 11, 2012; the pair of articles was updated March 11, 2015.

The author of both article installments is Hisamitsu Ino. CNIC Tokyo has published a biographical article about the author: <<https://cnic.jp/english/newsletter/nit132/nit132articles/ww132.html>>.

The gist of Hisamitsu Ino's articles is that predictions of embrittlement at Genkai Unit 1 proved to be significantly overly optimistic, non-conservative, when the predictions were finally, at long last, checked against actual physical data. The embrittlement was way worse than Japan's nuclear power industry and government safety regulators had predicted. The reality data-based validation of the overly optimistic hypothesis was long overdue, despite the high safety stakes involved.

After this revelation that embrittlement was actually much worse than had been predicted at Genkai Unit 1, the reactor was summarily shut down for good, post-Fukushima. The Japanese people would no longer sit idly by in the face of such risks. We should follow their inspiring and wise example, here in the U.S.

In the U.S., the NRC and nuclear power industry, as at Point Beach Unit 2, just keep making rosy predictions on paper, while scrupulously avoiding actual physical data that is quite close at hand -- capsules in RPVs that have never been harvested and analyzed; shut for good RPVs that could be "autopsied" (comprehensively and carefully examined and analyzed for physical data, such as extent of neutron embrittlement), etc. What is it that NRC and the U.S. nuclear industry don't want to know, don't want to find? There are still more than 60 Pressurized Water Reactors operating across the U.S., at various levels of vulnerability to neutron embrittlement of their RPVs, and hence pressurized thermal shock (PTS) through-wall fracture risk, which would lead to core meltdown, and potentially catastrophic releases of hazardous radiation, if containment(s) are damaged or destroyed, as happened at Fukushima, Japan beginning on 3/11/11, almost ten years ago now.

Palisades, MI and Point Beach Unit 2, WI, are -- according to NRC in April 2013 -- the worst embrittled RPVs in the U.S. This was acknowledged by NRC staff in the following document:

April 18, 2013: Giessner, J., U.S. Nuclear Regulatory Commission, letter to Entergy Nuclear Operations, Inc., "Summary of the March 19, 2013, Public Meeting Webinar Regarding Palisades Nuclear Plant," dated April 18, 2013 (ADAMS Accession No. ML13108A336).

Specifically, see Point #4 on Page 5 of 15 on the PDF counter. (This document is posted online here: <<https://www.nrc.gov/docs/ML1310/ML13108A336.pdf>>.)

We should learn from this cautionary tale in Japan, and pull all capsules in the U.S. that are long overdue, to check RPV embrittlement levels. Palisades in MI, for example, has a remaining capsule, the pull and analysis of which is very long overdue. Does Point Beach Unit 2 (and Point Beach Unit 1, for that matter) also hold capsules, the pulls and analysis of which are likely very long overdue?

In addition, there are retired (or "dead") PWR RPVs that could be "autopsied" -- comprehensively analyzed for critically needed embrittlement data. Indian Point Unit 3 is scheduled to shut down for good next month; Palisades MI is scheduled to shut down for good by May 31, 2022; Diablo Canyon Unit 1 is scheduled to shut down for good by 2024; Beaver Valley Unit 1 could also shut for good in the near future, if Energy Harbor (formerly, First Energy) attempts to secure bailouts at ratepayer and taxpayer expense continue to be met with such fierce resistance in PA, OH, and beyond. (See:

<<http://www.beyondnuclear.org/reactors-are-closing/>>.)

These PWR RPVs are the other four of the top five most embrittled in the U.S., according to that 2013 NRC document cited above. Most to all of those permanent shut downs would occur prior to Point Beach Unit 2 entering its supplemental license extension period -- that is, 60 to 80 years of operations. Why wouldn't NRC require autopsies on these other highly embrittled RPVs, to apply lessons learned at Point Beach 2 prior to rubber-stamping this latest requested license extension? Science is based on actual physical data, not just theories and hypotheses. The latter are to be challenged and tested to verify their validity. That would be science-based nuclear safety regulation, vis-a-vis PTS risks.

(to be continued)