



Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

February 7, 2013

Allison Macfarlane, Chair
Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, MD 20852

Dear Chairman Macfarlane,

As the second anniversary of the Fukushima nuclear accident approaches, we write to urge the NRC to stay the course of reform it has charted in the wake of that disaster. The NRC should continue to expeditiously address all the safety vulnerabilities that were identified by the Near Term Task Force, including those designated as Tiers 2 and 3, as well as the new issues that have arisen and will continue to arise as you conduct the reviews.

We would also like to reiterate our strong support for the common-sense recommendation of the NRC staff that the hardened vents the NRC has ordered Mark I and Mark II licensees to install be further strengthened to be able to function in the harsh conditions that may occur during a severe accident and be equipped with filters as an additional measure. The NRC staff has provided ample evidence to back up their conclusion that filters are a prudent, efficient, cost-effective measure that would also provide defense-in-depth by being available to greatly reduce radioactive emissions to the environment during venting under a range of contingencies. The presence of filters will give operators the confidence to use the vents if needed to reduce containment pressure if the status of the reactor core is unknown, as was the case at Fukushima.

By contrast, the industry's proposed alternative to filtered vents is a complex, highly uncertain research project that will take many years to develop and even more for the NRC staff to review and approve, and may even result in the industry determining itself that filters are the only reasonable solution. We see this as a stalling tactic that will unnecessarily delay the implementation of a far simpler approach: filters.

We are aware of the letters sent to your agency in recent weeks by congressional Republicans questioning the NRC's ongoing Fukushima response in general and the filtered vent recommendation in particular. These members of Congress would have the NRC conduct a lengthy comparison of U.S. and Japanese regulations, presumably to determine whether the Japanese regulations before Fukushima were more lax than U.S. regulations and hence made Japan more vulnerable to an accident like Fukushima. In our view, such a review, although interesting, would be of little practical relevance to the NRC's mission of ensuring that U.S. laws and regulations are fully implemented to protect the health and safety of the American public

from nuclear power plant accidents or terrorist attacks. Especially in a time of budget austerity, we do not support directing the NRC staff to divert scarce resources away from their core mission to pursue a time-consuming academic exercise.

Simply put, although the NRC has done much already, much remains to be done. The reforms already put into place do not address some of the most difficult questions raised by Fukushima, including the ability of operators to carry out essential emergency actions after core damage has already occurred and has spread potentially lethal quantities of radioactivity around a plant site; the threat to many U.S. nuclear plants downstream of large dams from a combined earthquake and rapid flooding event; the inadequacy of 10-mile emergency planning zones in the event of a radiation release such as occurred at Fukushima; and the dangers posed by overstuffed spent fuel pools containing much more fuel than the pools at Fukushima.

The NRC must continue to go forward and address the full range of severe accident vulnerabilities that U.S. plants face or we risk finding ourselves in a situation similar to that of Japan today, with a severely damaged nuclear plant, widespread land contamination, many people condemned to refugee status, and the nuclear power option potentially off the table indefinitely.

Sincerely,

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