



Via Electronic Mail

July 27, 2011

Annette L. Vietti-Cook, Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

Subject: NRDC's Petition to address facility emergency plans for prolonged station blackouts and multiunit events.

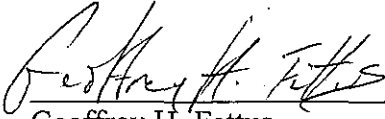
Dear Madam Secretary:

Pursuant to 10 C.F.R. § 2.206, the Natural Resources Defense Council, Inc. ("NRDC") hereby petitions the U.S. Nuclear Regulatory Commission ("NRC") to order licensees to do the following until rulemaking is complete: determine and implement the required staff to fill all necessary positions for responding to a multiunit event, conduct periodic training and exercises for multiunit and prolonged station blackouts (SBO) scenarios, ensure that emergency preparedness (EP) equipment and facilities are sufficient for dealing with multiunit and prolonged SBO scenarios, provide a means to power communications equipment needed to communicate onsite and offsite during a prolonged SBO, and maintain Emergency Response Data System (ERDS) capability throughout the accident.

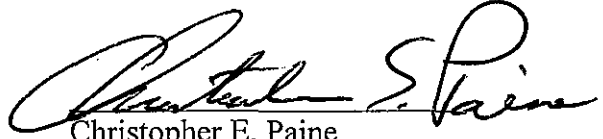
The rationale and the bases for this petition can be found in the NRC Staff report, Charles Miller, et al, "Recommendations for Enhancing Reactor Safety in the 21st Century: The Near Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," SECY-11-0093, July 12, 2011. We look forward to providing NRC with additional technical support for this petition after it has been accepted and docketed.

Please do not hesitate to contact us at (202) 289-6868 if you have any questions. NRDC appreciates your prompt consideration of this matter.

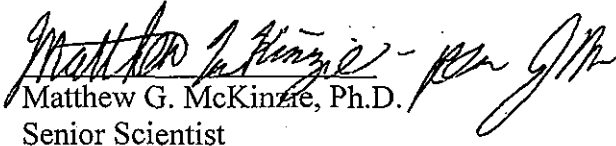
Sincerely,



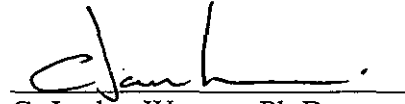
Geoffrey H. Fettus
Senior Project Attorney



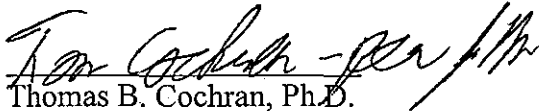
Christopher E. Paine
Director, Nuclear Program



Matthew G. McKinzie, Ph.D.
Senior Scientist



C. Jordan Weaver, Ph.D.
Science Fellow



Thomas B. Cochran, Ph.D.
Senior Scientist Consultant
Wade Greene Chair for Nuclear Policy

CC:

- The Honorable Gregory B. Jaczko, Chairman
- The Honorable George Apostolakis
- The Honorable William D. Magwood, IV
- The Honorable William C. Ostendorff
- The Honorable Kristine L. Svinicki

Proposed Actions

Pursuant to 10 C.F.R. § 2.206, NRDC petitions the Nuclear Regulatory Commission (“NRC”) to order licensees to do the following:

1. Determine and implement the required staff to fill all necessary positions for responding to a multiunit event.
2. Add guidance to the emergency plan that documents how to perform a multiunit dose assessment (including releases from spent fuel pools) using the licensee’s site-specific dose assessment software and approach.
3. Conduct periodic training and exercises for multiunit and prolonged SBO scenarios. Practice (simulate) the identification and acquisition of offsite resources, to the extent possible.
4. Ensure that EP equipment and facilities are sufficient for dealing with multiunit and prolonged SBO scenarios.
5. Provide a means to power communications equipment needed to communicate onsite (e.g., radios for response teams and between facilities) and offsite (e.g., cellular telephones, satellite telephones) during a prolonged SBO.
6. Maintain ERDS capability throughout the accident.

NRDC requests that the Commission issue its order within ninety days.

Rationale for the Petition for Orders

The rationale for this petition is found in the NRC Staff report, Charles Miller, et al, “Recommendations for Enhancing Reactor Safety in the 21st Century: The Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident,” SECY-11-0093, July 12, 2011. See particularly, Section 4.3.1, pp. 51-57 regarding Recommendation 9.3, p. 57. NRDC believes such an order and the Near-Term Task Force Review of this issue is consistent with 10 C.F.R. § 2.202 (a), which states in pertinent part: “[t]he Commission may ...take such other action as may be proper by serving on the licensee ...an order that will: (1) Allege ... the potentially hazardous conditions or other facts deemed to be sufficient ground for the proposed action, and specify the action proposed.”

Statement of Interest

NRDC is a national non-profit membership environmental organization with offices in Washington, D.C., New York City, San Francisco, Chicago, Los Angeles and Beijing. NRDC has a nationwide membership of over one million combined members and activists. NRDC’s activities include maintaining and enhancing environmental quality and monitoring federal agency actions to ensure that federal statutes enacted to protect human health and the environment are fully and properly implemented. Since its inception in 1970, NRDC has sought to improve the environmental, health, and safety conditions at the nuclear facilities licensed by NRC and its predecessor agency.