Dear NRC,

Please see the attached file, DECLARATION OF PIERMAN, KAMPS AND KEEGAN CONCERNING COUPON AVAILABILITY FOR PTS TESTING, dated December 1, 2014. It was submitted as a part of the Beyond Nuclear-Don’t Waste MI-MSEF Shoreline Chapter-NEIS intervention against Entergy Nuclear Palisades’ LAR for 10CFR50.61a regulatory relief. Please accept this document as public comment in this proceeding.

We object to 10CFR50.61a’s dismissing and ignoring existing, readily available hard physical data, and relying largely to exclusively instead on probabilistic risk assessment.

Palisades, for example, has four capsules remaining, which could be pulled and tested. But instead of accessing this readily available physical data, a scheduled 2007 capsule pull and test was simply canceled. A full 16 years between capsule pulls and tests (2003 to 2019) will have passed, with no reality check in between. Apparently, Entergy has no plans to access three capsules at all, during the 2019 to 2031 (extended license expiration in 2031) time period. This is unacceptable.

NRC’s rationale, as documented in the attached affidavit, that physical capsules can’t be pulled and tested, because then there would be no physical capsules left to pull and test, is absurd and unacceptable from a perspective of protecting public health, safety, and the environment from a scientific, physical reality-based regulatory approach. Over- to exclusive-reliance on PRA is unacceptable, and such aspects of 10CFR50.61a, as embodied in DG-1299 and NUREG-2163, cannot be allowed to stand in NRC regulations, regulatory guides, and their technical bases documents.

Sincerely,

Kevin Kamps, Beyond Nuclear (and Don’t Waste MI board member, representing the Kalamazoo chapter)

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