



Bellefonte Efficiency & Sustainability Team

B.E.S.T.

A local chapter of Blue Ridge Environmental Defense League • www.bredl.org



Comments to the TVA Board of Directors

2/16/12

Good morning. My name is Gretel Johnston and I am here to speak with you on behalf of Mothers Against TN River Radiation. First, we want to thank you for your service as Directors of the TVA, and we hope that our research and reminders of unresolved issues are of service to you in fulfilling your responsibilities to the millions of people in the Tennessee Valley.

As we have noted repeatedly since the near miss of the F5 tornado at Browns Ferry last April, there are over 3 million pounds of spent fuel in cooling pools there with no overhead containment. We once again call on you to instruct the TVA executives to complete and implement a plan for the moving of spent fuel rods from the cooling pools after 5 years into much more secure dry storage facilities, as recommended by the 2005 National Academy of Sciences study conducted for the safety of the American people at the request of Congress.

Although Browns Ferry has 3 Mark I reactors like Fukushima's, the oft promised 1968 GE Mark I study, APED-5696, "Tornado protection for the spent fuel storage pool", still appears to be unavailable. Later studies which cite the original APED=5696 study claim safety of the Mark I cooling pools based on what we believe are inadequate assumptions and outdated methodologies. There are three shortcomings to the studies that we would like to point out to you:

- 1) The formulas for evaluating the impact of tornado-generated missiles on the cooling pools are only applied to the sides and floor of the pools, not to overhead missiles. Since the only overhead protection for the pools are sheet metal roofs, and since tornados generally strike from above, safety models which ignore overhead missiles are inadequate.
- 2) We found no studies which use computer models or even miniature model testing.
- 3) None of the lessons from Fukushima have been applied, especially multiple disaster factors such as a tornado pulling large volumes of water from an overpacked cooling pool and large missiles displacing even more water and potentially damaging the fuel rod casings, with either or both leading to possible boil downs, fires, and Fukushima style explosions.

Given the shortcomings in safety analyses and design, we call on TVA to protect citizens from potential threats to its three Mark I nuclear reactors with the following two measures:

1. Implement an accelerated schedule for moving spent fuel rods out of cooling pools and into secure dry storage facilities, so that no fuel older than five years will be left in the pools by the year 2020.
2. Begin planning for full overhead containment of these exposed cooling pools, to achieve security equal to the less radioactive reactor cores, by the year 2020.

Thank you for your time and your careful consideration for the safety of our families.

Sincerely,
Gretel Johnston
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Mothers Against Tennessee River Radiation

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