

India's known to be defective Russian nuclear reactor at Koodankulam. Holtec, which is private, is also the “American” company who got contracts for a spent fuel storage in the Ukraine: <http://mfa.gov.ua/en/news-feeds/foreign-offices-news/32398-shhodo-ukladennya-ugodi-mizh-najek-jenergoatom-ta-amerikansykoju-korporacijeu-holtec-international> We don't even know for certain if Singh is an American or India National. Mittal lives in the UK and has kept his India citizenship. Tellingly, wikipedia says that Holtec is “based” in the USA. We don't know where it is registered. The proposed nuclear insurance pool is paid into after an accident. Will anyone be able to find Holtec to pay into the insurance pool? This sort of thing is why we are certain that the US taxpayer will pay some and perhaps most of the 1/3rd which the US promises to pay India, under this Convention, in the event of an accident. Probably Japan will pay 1/3rd and the remaining 1/3rd will be paid by a combo of India, Argentina, Romania, UAE and Morocco. Fukushima is estimated at \$110 billion thus far, even though they aren't even cleaning it up and are using the homeless.

Oscar Shirani and others expressed concerns about Holtec spent nuclear fuel dry casks, and the NRC. Some of his concerns appear supported by a more recent (2011) NRC Notice of Violations. Holtec's dry casks are sold around the world, and will be in our midst for some time. They are also used for transportation. With apparently lax railroad track upkeep in the US and UK, the ability of spent fuel transportation canisters to resist impacts is serious.

The late Oscar Shirani wrote a comment to the NRC on Mon, Oct 30, 2006 11:18 AM Subject: “Exelon's Clinton Early Site permit EIS”. In his comments he noted that *“In Dec. 4, 2002, NRC wrote to Shirani: we substantiated that a stop work issued by Exelon's QA program to GE-NE was lifted based on a vendor's promises rather than verification that the underlying problems had been corrected...”* In the NRC inspection documents, which we have read, we have also noticed this thing repeatedly. They simply say what's wrong and make the supplier write a letter saying what they will change. These are often serious and even deadly issues and the NRC doesn't appear to care at all. The NRC attitude to nuclear suppliers appears to be “It's alright darling baby doll!” In his comment to the NRC he interestingly states that *“Dr. Ross Landsman and Oscar Shirani both believe that the Holtec's Nuclear spent Fuel Dry Cask are nothing except garbage cans with design flaws, welding flaws, and manufacturing flaws and dangerous to public safety in our backyards.”*

This is a 2011 Holtec Inspection Report Summary:

NOTICE OF VIOLATION

Holtec International
Marlton, NJ

Docket 72-1014

Based on the results of a U.S. Nuclear Regulatory Commission (NRC) inspection conducted from October 25 through February 10, 2011, violations of NRC requirements were identified. In accordance with the “General Statement of Policy and Procedure for NRC Enforcement Actions,” NUREG-1600, the violations are listed below:

A. Holtec International is a certificate holder of Certificate of Compliance No. 72-1014

10 CFR 72.48(C)(2) (viii) states in part “...a certificate holder shall obtain a certificate of compliance (CoC) amendment pursuant to 72.244... prior to implementing a proposed change... if the change... would: ...Result in a departure from a method of evaluation described in the final safety analysis report (FSAR) (as updated) used in establishing the design bases or in the safety analyses.”

Contrary to the above, Holtec failed to obtain a certificate of compliance (CoC) amendment. Specifically, Holtec’s change to FSAR, Section 3.5, is a departure from the method of evaluation originally used to establish the safety analysis for cladding integrity during a drop accident event, and therefore, this change requires a CoC amendment request.

This is a Severity Level IV violation (Enforcement Policy 6.2).

B. Holtec International is a certificate holder of Certificate of Compliance No. 72-1014

10 CFR 72.146, “Design Control,” states in part “...the certificate holder shall apply design control measures to thermal-hydraulic design.”

Contrary to the above, Holtec failed to apply design control measures to thermal-hydraulic design. Specifically, Holtec’s design control measures were not adequate for the following four examples:

- 1) Measures did not ensure thermal evaluations during vacuum drying conditions were adequate which resulted in FSAR peak cladding temperature allowable limits potentially exceeded.
- 2) The measures did not specify vacuum drying time and head load limits in Amendments 1 through 4 technical specifications.
- 3) The measures did not provide required actions with supporting thermal-hydraulic analysis in technical specifications when Condition B of LCO 3.1.1 is entered; and,
- 4) The measures did not include either in the FSAR or the technical specifications supporting thermal-hydraulic analysis and acceptance criteria when nitrogen gas is used to blow down the canister.

This is a Severity Level IV violation (Enforcement Policy 6.2).

Enclosure 2

This part looks very damning:

“The team noted that the 72.48 change: a) introduced a completely new method as the basis for demonstrating the integrity of the fuel rod cladding during a vertical end drop of the HI-STORM 100 while being transported to the ISFSI pad; b) endorsed a Lawrence Livermore National Laboratory (LLNL) report (No. UCID-21246) for the axial buckling of fuel rods as the basis for demonstrating the integrity of the fuel rod cladding even though NRC technical staff determined that the LLNL report was inaccurate and therefore unacceptable and that the correct guidance is provided in ISG-12, Revision 1, published in 1999; and c) justified a g-load limit of 45gs for the HI-STORM 100 System based on information provided in NUREG-1864 to predict cladding failure even though the information to support a 45g limit does not exist in the NUREG.” Take another look. They justified based on a regulation, even though the information isn’t in that regulation **“JUSTIFIED... BASED ON INFORMATION... DOES NOT EXIST”!**
From: **“NRC INSPECTION REPORT NO. 72-1014/10-201 AND NOTICE OF VIOLATIONS** Read the entire report

Mining Awareness Plus ~ Critical Information & Awareness

Nuclear Supplier Holtec – “Notice of Violation” by NRC & the India-US Nuclear “Deal”

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Holtec, privately owned and founded by its India born and educated, President and CEO, Krishna P. Singh [1], is one of the big bad “American” nuclear companies, which will probably benefit from the India-America nuclear deal. Singh also serves on the board of the Nuclear Energy Institute. Holtec International is a global nuclear supplier based in New Jersey, USA; designs and makes parts for nuclear reactors; sells equipment to manage spent nuclear fuel; makes dry cask storage containers for spent fuel. It is also apparently trying to foist an underground modular reactor, SMR-160, a 160 MWe pressurized water reactor (PWR), upon the world. In July 2014, the State of New Jersey gave it a \$260 million tax incentive (tax break) to expand operations at the Port of Camden.

http://en.wikipedia.org/wiki/Holtec_International An underground nuclear reactor was already tried in Switzerland, melted down and contaminated the cavern and drainage water still has radionuclides.[2]

This is one more piece to this “nuclear deal”, which was apparently brought to America and India by India’s very own. The new US Ambassador to India, Richard Verma, was born in Edmonton, Canada of parents from the Punjab area of India. Moreover, he worked as a Steptoe & Johnson lobbyist for the US-India Business Council to push the “U.S. India Civil Nuclear Agreement and ratification of the 123 Agreement in compliance with the Henry Hyde Act,” along with “US-India Civil Nuclear Agreement’s 123 Bilateral Agreement in 2008.” [3] Tejpreet Singh Chopra served as President and CEO of GE India from June 1, 2007, and was on the Board of the US-India Business Council from ca November 2007. A press release from Nov. 25, 2008 announced that the Nuclear Energy Institute was partnering with the US-India Business Council for the “largest trade mission of US commercial nuclear executives ever to visit India”. That just so happens to be the year that Richard Verma was their lobbyist. And, it just so happens that when Verma got appointed Ambassador that this Convention came under discussion again. See more here: <https://miningawareness.wordpress.com/2015/01/28/westinghouse-is-japanese-toshiba-not-american-for-16-years/> The CEO and President of GE India, Banmali Agrawala, since April 1, 2013, serves on the US-India Business Council Board.

Oh, my goodness, those terrible big, bad bully Americans who are foisting nuclear on helpless India! Let’s not forget that the construction companies for any nuclear reactors will be largely local. And, Jindal Steel and Arcelor Mittal will probably provide the steel. And, with this deal, the American taxpayer will become partially liable for