From: "Michael Mulligan" <stmshvl@together.net>
To: "Victor Dricks" <VLD@nrc.gov>, "Deb Katz" <can@sha...
Date: Thu, May 18, 2000 9:24 AM
Subject: SUSQUEHANNA and MSIV

Dear Mr. Dricks
Two recent event are a new concern to me.

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| FACILITY: SUSQUEHANNA REGION: 1 |NOTIFICATION DATE:
03/24/2000|
| UNIT: [1] [] [] STATE: PA |NOTIFICATION TIME:
05:56[EST]|
| RXTYPE: [1] GE-4,[2] GE-4 |EVENT DATE:
03/24/2000|
+----------+EVENT TIME:
04:45[EST]|
| NRC NOTIFIED BY: DAVE WALSH |LAST UPDATE DATE:
03/24/2000|
| HQ OPS OFFICER: DICK JOLLIFFE
+----------+
+----------+PERSON
ORGANIZATION |
|EMERGENCY CLASS: N/A |LOUIS MANNING R1
|
|10 CFR SECTION: |
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|ADAS 50.72(b)(2)(i) DEG/UNANALYZED COND |
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|UNIT |SCRAM CODE|RX CRIT|INIT PWR| INIT RX MODE |CURR PWR| CURR RX MODE
|
+-----+----------+-------+--------+----------+--------+----------
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|1 N N 0 Refueling |0 Refueling
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EVENT TEXT
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| - 'C' INBOARD MAIN STEAM ISOLATION VALVE FAILED ITS LOCAL LEAK RATE TEST -

ENCLOSURE

| During the performance of a local leak rate test of the 'C' main steam
| isolation valves (MSIVs) with Unit 1 in a refueling outage, the inboard MSIV |
| #HV141-F022C was unable to hold pressure. This constitutes a failure of the |
| maximum path leak rate required by Tech Spec 3.6.1.3.
| This condition constitutes a degraded condition of a principle safety
| barrier found while Unit 1 was shutdown. No other adverse conditions were
| identified.
| Unit 1 remains safely shutdown and the licensee is conducting an
| investigation to determine the cause of the failure.
| The licensee plans to notify the NRC Resident Inspector.
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You and this utility are delusional with the rational of defining the safety significance of this as are only occurring while the unit is shut-down. Just because you fraudulently define it as potentially only leaking while the unit was shutdown by some maded-up definition, which was a gift to the utility, you do not have one bit of engineering proof that the leak stayed within the boarders of this shutdown. This type of faulty engineering rational leads to a wide spread systemic safety problem within the utility and NRC culture; because it's based on a sugar coating based type of thinking- that is a bases of a lie in it- which you all know and except. You are fraudulently reporting a smaller potential amount of leakage and consequence to the public; which in the end facilitates the repeated failure of the valve.

The only fair way to look at it, is the valve leaked at this new tested rate since that last time the valve was tested, in the last shutdown and refueling outage. You are all fixing the numbers and don't recognize it, and you are doing it as a political gift. I warned you over a year ago that you should no longer consider the leakage failure of the MSIV'S at SUSQUEHANNA in isolation, that the historic prolonged record of extremely poor MSIV maintenance at both SUSQUEHANNA plants must be considered. I even gave you the idea that you have a valve design problem in the the valve's are not durable enough for the intended safety function: remember I played

with the issue of replacing all the MSIV'S with new valves. I said last year that the historic MSIV leakage and maintenance record guarantees that one or more valves fail any future testing. How many years of records does it take to get your attention; besides paper whipping the issue.

I want to know in your safety analysis how many MSIV's are assumed to be defective prior to a startup. This facilities historic record now proves just such a situation. You can define it away with games, but the truth is different. I though safety analysis defines that all safety devices are 100% functional at the time of startup; and the equipment has a history of reliable service; and assumes a high level of quality.

Let me tell you what your valve testing is proving. That the leakage detected when cooled down and repaired, is only reliable valid while the unit remains cooled down and not gone through a heatup and operation cycle. Further, the utility typically repairs a Msiv, then on the first retest which passes the criteria, it is accepted. You got any proof that the valves leakage remains below the limits after cycling it a reasonable amount of cycles, or is the valve repaired enough for just one or two opening and closing cycles-never mind the heatup and operating cycles. By the way has there been any preconditioning of the valve at SUSQUEHANNA prior to leak rate testing?

mike mulligan