

From: "Michael Mulligan" <steamshovel@adelphia.net>
To: "Victor Dricks" <vld@nrc.gov>
Date: 7/10/02 8:53PM
Subject: To Mr. Stuart A Richards, Director

50-277/278
50-352/353

Mr Dricks,

Could you pass this on to Mr. Richards.

thanks, mike

July 10, 2002

Mr. Stuart A Richards, Director

Projects Directorate 1

Division of Licensing Project Management

Office of Nuclear Regulation.

Dear Mr. Richards:

This is in response to your letter dated Jun 14 2002- which concerned my 10 CFR 2.206 dated March 18 about Exelon Nuclear- Peach Bottom, Limerick... I respectfully request that this response go to same licensees as the 2.206.

The statement of "our practice at the NRC is to respond to all correspondence" your June 14 letter to me of is factually inaccurate. Of course, your agency just may have a special internal definition of the word "practice" (To do or perform habitually or customarily; make a habit of):-maybe multi definitions of the word that is typically not in a dictionary, which can be used as defensively as appropriate. Maybe a plausible denial term of the word and phrase, or a sugar sweet public relation definition, that is not at all connected to current agency's use and objective practice. Maybe a specific usage of the definition for your perceived enemies or paid friends? I think we need a new congressional law prohibiting word/ phrase games-with the agency using only the definitions that are in a current dictionary. One wonders what the agencies internal definition or "correspondence" and "respond" is. Of course, as a recent president put it across a legal suit, it depends upon what the definition of "is" is.

Next, the agency will be telling me in an official correspondence, "Our practice at the NRC is to answer all questions coming from any external correspondence". By the way, do you have any official policy on when you can officially answer, ignore or intentionally distort, questions ask to the NRC within any official forms? Is it catch-you-as-you-can, depending if you are a favored or unfavored relationship, or what kind of signal the agency wants to express to the outside? I would say that less than 90% of my e-mails to Mr. Dricks ever gets a response in the last few years. There was never no explanation of why there is a response or why there is not. You bet I try to hold the agency accountable to the words they communicate with.

You have "almost" a perfect record with responding to my 2.206's, except many of my questions go unanswered. Many of these e-mails have identified on the subject area as a safety concern or a national security concerns. We do know that Mr. Dricks has been identified as a NRC official who tasked with

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Add: John Boska

initially assessing public safety concerns. Of course, even if I address the e-mail to Mr. Dricks, I am always making an official communication to the agency. I am talking the NRC.

Let me get a little bit specific. Doesn't a member of the public have a right to petition this governmental agency? Isn't the agency keyed through policy and regulations into a structured response to members of our democracy? It is painfully obvious in a democracy; that any agency of government has the highest responsibility to assess, and fully respond to any petition initially given by members of the public. It should not have to be proceduralized or regulated- in order for the agency to answer the public ethically. A full, clear and timely response to a petition should be instinctually structural in the ethics of the agency, needing no bureaucratic regulations in a modern democracy.

The reasons for regulating petitions- is in the past the agency has thumbed its nose at meeting this foundational societal responsibility. In many past petitions, the agency has made strategic purposeful mistakes and errors, disinformed and selectively answered the petitions - in effect played games with this societal responsibility. These games have a repeated theme; it to gain favors with the politicians, to protect the NRC bureaucracy from accountability, and of course, to benefit the industry. Let me tell you, you know who your friend are. These are the facts why petition regulations have come to be.

Is it so difficult a question to predict- just why was the March 18 petition not promptly assessed as a petition? Was the non-timely response contrary to agency policy and regulation? Why wasn't I given a telephone call per 8.11? An e-mail would have been acceptable. This is a big deal, and I should expect a clear explanation of what occurred and why. Shouldn't the NRC have given a clear explanation of what occurred contrary to 8.11-without a prompt? The statement that we processed the petition following the guidance of 8.11 is extraordinarily selective- after how many errors- and after the second attempt-just when did it begin- the assessment as a 2.206. If the NRC has not promptly accessed- according to 8.11- petitions, shouldn't that be a concern even if you don't have a validated petition? Isn't it an issue that the process might have a kink in it- in that there is confusion on who to direct a petition by e-mail? The only stated justification for your error in your explanation to me, is that we made an error in entering the petition our "tracking system". Is the primary function of the petition process; is entering the document it into the tracking system? You answered me as such.

By the way, do you have a definition "a general opposition to nuclear power" or a "general assertion of a safety problem" (You don't in 8.11 definition section). Can these terms just be thrown out as an excuse to not answer a question? I get why you prohibit the term "general". Its because the agency and the industry prevents to independent collection of specific plant information- thus you want to "game" the public participation, by creating a insane rules logic system- such that the public has no real reason by the rules logic game to credibly ask an informed and intelligent question. It's general information of theirs: because our plant security is second to none.

Just to be clear, is it an acceptable government policy to answer a member of the public in such vague, non-specific and unaccountable language? Do you live in a culture of bureaucratically structured unaccountability, and is it accepted, as a normal way of doing agency business. Do you just play these games with people you term as anti-nuclear or anti-American or however you define the "us or them"? Is that were we are heading, back to the Jim Crow days, were you have to ask a informed question, where you have a bureaucratic high security fence around potential of being informed. Will you define as enemies of the state, anybody who ask a question?

If you put that policy statement together of "Our practice at the NRC is to respond to all correspondence" with my recent issues to the NRC of "you don't have a fair communication policy or adequate resources to respond to critics concerns", then a rather large public policy integrity issue comes up. The issue of making that statement (respond to all correspondence) in the June 14th letter, and not bothering with checking the actual facts of it as related to my prior communications with the agency, doesn't sit very well with the image that the agency has to be objective, factual and detailed oriented. Does the agency just make soothing public policy integrity statements as an act of falsification? Are these broad disconnected statements used a means to "game" your opinion of agency integrity to the public? Inaccurate statements nationwide for Corporations and agencies of our government has become a big issue. Just to be blunt so

there is no misunderstanding, your communication to me has been illusionary and vague, which is an intentional NRC policy of not communicating uncertainty with agency policy or plant situations.

The NRC very rarely responds in writing to my communication to the agency, with it being absolutely contrary to the agencies stated public policy illuminated in the letter. Even if I do get a response, the response is meant to be vague and non-specific. The function of this strategy is to not have anything specific in writing. It's a protection strategy for the agency and the industry. It's a official system of non accountability -such that you minimize expressing in writing concrete agency technical and operational facts, and strategy, such that outsiders could have a written vehicle to analyze industry facts, which to access agency and industry credibility. You don't want the object facts to get into the way of the agency's illusionary relationship to the utilities.

Let talk about our democratic responsibilities-not legal requirements of non-transparency. Let's say I have an issue with the inappropriate operation of torus cooling at a plant. The game of a utility would not be to answer any specific questions of mine- why because there is no governmental requirement. These utilities think there is absolutely no pay-off to them in disclosing internal dirty laundry. I guess it's more a cultural problem throughout the USA; why disclose anything if there is no payoff for "me". That is exactly the problem, these uncontested communication strategies are derived to protect the "me" of the corporation, the industry, or the agency. This is not a way to live in harmony in a democracy. This selective transparencies set up all sorts of power distortions and reasons for individuals to not speak up in all these entities. You turn one man against another for the power of "me". I told you before; there is no better individual or entity-governing device that the universe has invented, than transparency and truth. Really, I don't like it better than anybody else: but it works as a tool to create stability. I would rather now have increasing stability of the world around me than the power of "me" today. I am telling you if you want these big machines, systems, bureaucracies and governments to work efficiently, and within stability for us all instead of the elite "me", then you would abandon untransparency tomorrow. For the good of the world and your real "honest to god" self interest!

I not at all saying you should sacrifice our creative individual self's for the good of us all. It is just that we have become massively tilted towards the strategy of organizing the world for the "me". It takes a balance, and we need all the sides of us to create the garden we came here to create. All of the players inside us need to have their time at the podium- to express their truths freely. Maybe it's that creative friction which does it. The paradox does not pass by me, that the "me" of us has create the most abusive governmental regimes of this century, and the "me" of us, this singular point of creativity, is responsible for all our humanistic and technological advancement.

We need to see a lot more of the "us" and "them" in us. Not as a social rule to make somebody either good or bad. The mental "us", the mental "them", the ideas that are in our heads. Looking out for somebody else's welfare produces stability. Looking out for somebody else's welfare creates trust, and thus reduces the footprint of government and regulation. What this world disparately needs is stability and creativity. With these two twins, it won't be long before you will be managing the stars themselves.

The utilities have no requirement with putting anything on paper, unless it is suitably vague. Remember answering a specific question, gets you to the point where they get to express their official take on the situation, which just may be a cover story about them taking intentional chances contrary regulations. An outsider then have the opportunity to get inside information or other related documentation, which challenges this reckless high level strategy. An employee with a conscience may finally say, hey that is not the real way we do things. Being untransparent, and not concrete on these very sensitive issues where at lot of money is on the line and plant operational strategy is not illuminated, is a very undemocratic interlocking game of the NRC and the agency. It also inappropriately increases corporate CEO bonuses and pay- and makes the grid reliability brittle.

Getting them to express specific plant situation on paper is an enormously powerful public accountability tool. The utility doesn't believe a word of this, but it is really in their highest interest to be strictly held accountable. It's how they can maximize profits over the long term and how society can efficiently plan for their energy future.

Would I choose an intentionally structured hypocrisy, or hypocrisy which is driven from by living in constant turmoil, being uneducated, having moral or ethical blindness? Would I choose a smart thief who knows the consequences of his action or a crook that will never fully realize that he is stealing from the innocent? I would choose the intended hypocrisy and the smart amoral thief always. This indicates potential sensitive awareness with always the potential of recovery. Many people who live in an (un) intellectual tunnel of sorts, just choose to never get out. I will always choose living and life, as you should.

The aberrant little boy, who lives inside me now, grew up in a low-income, big inner city housing project. My mother at the time was an alcoholic single mother who had three kids. I am constantly fighting that project hardened punk in me today.

Come see my grammar school report cards at my house today. We will cry together again. I had horrific grades and the comments about me from the teachers were pitiful and pathetic -and I imagine truthful -throughout my grammar school years. Where is god's grace in the darkness of a ten-year-olds bedroom?

My mother would come home in a drunken rage late at night -sputtering about that selfish SOB going home to his no good wife. She would come up to my bedroom to rake me up and down from a sound sleep, about how I am a lazy, dumb, can't clean up after myself, SOB. She was cruel and mean-and I usually got hit awake from the sleep. She said repetitively, that I would never become any good. Another good one was "when I am dead and gone" that's when you will miss what I've done for you. She would berate me and cry for an hour or more until she felt spent and tired enough. This happened hundreds of times and she did the same with my sister. I wonder who tough her this bag of tricks.

I had a drinking, or get high buddy, who was about 25 years old and I was 17 (17 through 25 knowing Frank). At the age of 25, Frank spent about half his life in reform school or jail. Frank's mother and father were in the news a lot when he was a little boy- they had horrendously physically abuse Frank. Frank was friendly with his parents when he was 25. Frank at the time said they couldn't help it, they were alcoholics.

Frank was married. He had a beautiful 3 or 4 year old little boy as we became friends. Later, in more nights that I care to remember, the gang of us would be drinking and playing cards while giving the little boy a can of beer to quite him down. Little Frank sometimes would throw a fit before bed, saying he hadn't had his beer yet. We thought it was so funny, although not the repeated tantrums that disturbed our drinking, drugging and card games. If you asked Frank what kind of work did he do, he would tell you directly that he was a thief. He never ripped off his friends. At times he was enormously generous to his friends, with the stuff he had stolen from you and your businesses.

As unsuccessful as he was at staying out of jail, he knew how the justice system worked. I helped him delivered a case of gratis stolen "large" fresh shrimp and lobsters to one of his lawyer who was becoming a judge. Frank's driving license had been taken away for him after he had hurt somebody. We went to one of those nice neighborhoods, where lawyers and doctors lived. Frank told me many of players in the system grudgingly respected him and appreciated his gifts- the police, lawyers, prosecutors, jailers and judges. He told me they all knew his thievery provided jobs for all these officials. He said, imagine how much effort and money it takes to get me behind bars. This guy got away with unbelievable things.

My "sort of" stepfather (Charlie), who never lived in our apartment, drank at the local upscale bar named "Danny Boys". He mingled there with his friends, the Irish police commissioner, a few politicians, the lawyers, the crooked Irish cops and the loose women. My uncle's brother who was a lawyer, a WWII war hero and a politician, drank himself out of a family and died there too. Charlie's "real" children told me he had screwed up with his own kids so bad, that he was trying to make it up with me. He tried to teach me how to drink with his friends. I started drinking beer there at 16 years old. Within days, when the drinking

age had changed to 18, I became a bartender. The stories I heard when we were all drunk.

The respected Police commissioner owned the most notorious downtown "Shamrock" Bar. It was right across the road from the 30 story Hotel Charles flophouse. That bar was horrendous, with the downtown hookers, drug addicts, alcoholics, the innocent disabled, and drifters. Charlie gave me the commissioner's assistant's name and a phone number, telling me "for Christ sakes, give the cops this before they give you a ticket or arrests you, but if you kill somebody or commit an armed bank robbery, nobody will help you". One wonders what legal favors the "real" elite children were given- they got into trouble too. I had to ask Charlie's friends for a favor or two.

Frank's mother and father drank themselves the death. Frank was dead by forty from a drunken car wreck- and he spent a few more years in jail in between. Frank's little boy, an enormously violent childhood and shot to death in a gang fight before leaving the teens at another project. Frank's pretty wife, a shell of herself and a current drug addict. Frank's wife two sisters, who were "lookers" when we were young, are drug addicts and alcoholics- with maybe five children who have been in and out of foster care and at least that many fathers. Frank's older brother now has a permanent home in jail.

The Murphy boys, and their sister that never went to school and grew up just a few doors down from us, indicates a lot about our neighborhood. That house always had drunken and screaming fights coming out of it. One brother was dead by the 35th birthday by the self-destructive ravages of alcoholism. The other brother, one of the most violent of any of us, is a quadriplegic via attempted suicide-car. He is relatively peaceful to the world now, and believe it or not, saved us a lot of tax money. The uneducated mentally disabled girl is now in a group home, is the only one left who didn't hurt herself or hurt somebody innocent.

This little happy family of ours lived in one corner of the projects (Springfield, Ma), the invisible fathers, the young adults and their children.

By 27 years old, I had to--- actually the system made me confront the choice of continued drinking and death, or life. The hardest part was leaving my friends of youth. The hardest part was disconnecting from my enormously defective support systems of family, friends, and community. My brother was a drug addict and alcoholic, and my sister was just an alcoholic. My brother was seven years younger than I; with me teaching him all the tricks well about his serious addiction. My mother's sister was an alcoholic. Let me be clear, you can tell the difference between a hard drinker and a alcoholic.

My siblings have been drug and drink free for decades- and I told them first after I was sober a year, that they could quit drinking and lead a good life. Actually I hounded them for years to stop what they were doing- they hated me- before it took.

Have you ever contemplated intervening into somebody else's life? After all, who am I to tell some body how to live, when I have all the proof I need to decide that I can't even manage my own life. I had my sober buddies tell me after sharing with them the bright idea of forcing my siblings to stop drinking; you don't give up that type of lifestyle unless you want to. Did you even get that anger welling up inside you, that creative urge; the I don't care what anybody says, even my family- I feel I can do this. I told myself I will sweet-talk, plead, beg, bribe, lie, scream and holler, manipulate and I will get them to stop -or wish they had. And over a few ruff years the miracle happens, first my sister, and my brother after a few more years!

This is at the crux of my family's problems today. They know I have felt this enormously beautiful presence coming as a direct result of this. I have the urge to stop and understand the insanity of my earlier life.

Did you ever have the feeling that the magnificent presence was sitting right next to you- I did? I felt for a moment, an astonishing intense beautiful pure love and I recognized it for what it was immediately. It never spoke or asked me for anything. It just kind of like showed me who he (she) was, let me feel it for a moment -and asked in a way, to see mine, and then vanished. I've always wondered, was it imagined or was it real.

It would all make this a lot easier if my father -just gave me a list. My wife says I only do well with lists, if at all. I promise to pay attention if any burning bush or outcropping rock begins talking to me.

All I want to do is feel it again- to replicate some small proportion of its light, as a reflection of my life. To feel that brilliance coming from some other persons life-which I have. It needs to only be a trickle-maybe just a beautiful sunset. I have seen it in the delights of my wife's smiles and in her forgiveness of my faults. I've seen it in my 8 year old boy's staring happy eyes and not seeing any faults yet in me. I've seen it in the absolutely normal disapproval and impatience of my 16-year-old daughter with me. I'd heard the presence in the childhood stories of my wife's mother. I have wondered to this day, just why did it occur to me, and what do you want me to do with it. This gnaws at me.

Failures and poor consequences have no meaning against this beautiful presence in which I can feel. Even if another success does not come my way, the mere fact of trying to help someone is enough for the satisfaction of that presence. The definition of helping someone, may just included creating a severe crisis-such that they will come to their senses. If I can't change their attitude, at least I can make them think. Believe me, my wife thinks some of my behavior is beyond bazaar and destructive to our family. She knows I will pick fights that I have no chance of winning- and it has created great turmoil within our family. She has seen a few hat tricks other than my siblings too. She has come around to most of my insanity.

You know what my definition of a miracle is? It is somebody, who feels what is possible, against all odds, acts on it, never gives up, and brings the gift into our reality. I make miracles. My friends, we are all heroes. We all make our futures. Maybe our future is what comes from our imagination -and what we think is possible-is what we drag into reality by our "actions". This is that stupid thought which has gotten me into sooo much trouble. Will you make miracles??

I began the process of running away from my "life the system had planned for me" by doing the craziest thing imaginable to most of the people around me. It was my first act of defiance-at least to the ones who I thought loved me. I joined the Navy at about the same time Nixon was getting disgraced.

One wonders why I didn't get many favors from my elders in my early years with stabilizing my life and helping me in school. I do believe my "educated" elders were stroking me with attention and favors, in the hopes that I would more fully participate later on in their illegal big time activities.

I have to admit that the aberrant Irish child in me knows how to survive and never gives up. Never stops fighting. I know that love never gives up either and everyone has the potential of recovery. I know that nothing "out there in the universe" will ever stop you if you want to harm yourself. Even if you start off being innocent- it takes somebody who walks on this planet to save many us, if we can't do it ourselves. The only "boot-strap", is the one somebody gives you and educates you into being a full human being

In my earlier days, justice wasn't derived from some higher philosophical, individual or governmental code of morals- it came from the corrupt relative power of professional and governmental officials who were operating behind the scenes for their own self interest. Your know, operating for one's selfish interest may mean getting a few extra bucks in your pocket by corrupt means, or it may include doing something corrupt because you have a terrible need to be one in a group. We are social beings.

I know I've made knowingly corrupt choices in my early life- which are at the root of the problems of those times- and are not the responsibility of any "other". But I was educated and brought up in a terribly neglectful life situation. So are corrupt relationships, illegalities and untruths, mere terms of relativity within the days of our lives. Is it just about how much power you hold? It is at Danny Boys. It is in the Robertson Gardens housing project.

Did I tell you the streets of my project were named after dead WW II Heroes? At first, you could only be a veteran (WWII and Korean) to get into that project. Such high hopes and low expectations. My "father of record" was drafted into WWII and again called-up against his will for the Korean conflict. My father's brother was a renowned fertility doctor in Boston- who became an alcoholic in his later years and prematurely stopped working. My father was dead from a heart attack by age 41-I was seven-he had

worked in a poison chemical cloud at Monsanto, was a heavy smoker and alcoholic. His driver's license had been taken away from him for five years -in multiple DUI's.

My elders had volunteered the child "who I once was"- for inclusion in a low intensity war. I willingly volunteered myself for the parallel conflict; with the instruments of self-destruction my generation invented for us and I willingly enjoyed. The combined casualties and death rate per population of our war were higher than most battlefields of the past century. As in all wars, we knowingly included and consumed our children.

Can anybody imagine how much money we wasted, the human service bureaucracy, the police, jails, the medical bills, the lawyers/judges and all the stuff in Washington? You can't imagine the magnitude of it. What an enormous drag on the economy. As Frank implied, we fed an enormously powerful political machine and bureaucracy, and votes; whose "goods and services" consisted of crippled children, death and hollow lives. Nobody really wanted us to get better!

All I have left of those childhood and young adult times of mine is my guilty memory. I have much to be guilty about. I have trucked throughout our country on our interstate highway system looking for forgiveness and have not found it yet. Will you forgive me?

I did have good times, and I did see beauty, wonderment and friendships, in my youthful years. I have today an overriding awareness today of the horrendous human wreckage to the living and the dead from that era. I feel the continued cost of numbing awareness and not speaking up. I had seen the cost of living of in a tunnel and of making the choice of never wanting to get out.

If I had one message to the kids today; is that you won't forget one moment of your childhood and young adult life. It will live in you for the rest of life.

I am the product of a "not earned" lovingly tap on the shoulder begging me to choose life- in the person who initially helped me stop drinking. I didn't go to him he intervened. That initial person's warmth yanked me from my trajectory- he had a jail record that would choke a horse- and by that, he extended a lovingly outstretched hand of life to my brother and sister. Nobody on this planet more knows the joy of our choices than me.

Lets talk about what the agency really means with the secrete internal code word statement that "unionization of certain Exelon plant is outside NRC purview". This Unionization purview is really a code word of understanding between these corporations, this USA governmental agency, and the anti employee empowerment group in congress. The theme of this understanding is to make any conflict between management and the employees, defined as an employee or unionization issue in which the NRC is prohibited to make an agency assessment. This is a long term high level agency and political strategy, which is intended to disempower the regular employees, and I might say fractures the trust of the employees to the agency on sensitive internal issues. It is designed to improperly shift abusive power towards the corporation. It does raise safety issues, in that it will create walls where the employees think the NRC is not fair and respective to safety issues. Thus the employee will not discuss sensitive internal issues with the NRC. It that an intentional governmental strategy where they keep the agency relationship to the plant employees at arm length? Is that an elite outgrowth of the disempowerment group in congress, who sets the abusive power of government against the little guy and has created a mindless war against us? So let me put it another way, the NRC have a poor system employee redress within the agency, so why should we (NRC) maintain fairness at a plant. You know it's a jungle out there!

Lets say during a union drive of a plant, a popular union president becomes aware on series safety problems with the plant- and raises the issue to plant management and then to the NRC. Then the plant

management decides to squash the unionization, they fire the president unjustly as a means to assert uncontested abusive power as a means to win an election for the corporation? How about if a few employees decide that they are going to economically sabotage and blackmail the corporation into accepting an illegitimate unionization? How about if the employees conspire to not report safety problems to management, as a tool of blackmail in a unionization push at a plant.

All of these "made up" issues then shift into a direct threat with public safety and a substantial responsibility for the agency to intervene proactively. All employee and management conflicts has a rather high potential to uncover serious underlying nuclear safety problems, which has not shown up yet as degraded, failed equipment or operational errors. Has the agency ever set up a thoughtful criteria -in which the agency differentiates between a rather mild manner unionization in which the employees are trying to maximize their interest, or if employees are struggling to grasp straws against a wayward corrupt corporation of enormous breath-political and regulatory.

It is in the public interest that the NRC never makes blanket prohibitions and is always responsive too subtle and unexpectant changes at plant. Even the potential events that have not occurred yet!

As the NRC is aware, I raised many 10 CFR 2.206 petitions in the last few years. This is the first one that has not been answered in a timely manner. How many times in the past has the NRC forgotten to answer any 2.206 or put it into your tracking system? You have not mentioned if the failure to enter it into the system was a simple human error or something else. How hard is it for your agency to send back a quick e-mail saying the agency has received it and it has been entered for processing? It is a simple courtesy. Were any of you in the Navy, like a repeat back used in power plant communication? Thus, it's my opinion that the agency had intentionally planned to not answer me or to delay a response. It should be remembered that you regularly send e-mails to the licensees.

There is no one who has been more directly accusing the NRC of being intentionally corrupt. From your illusionary plant documentation, and including the agencies selective regulatory philosophy, I know you are the handmaidens of the industry and widely corrupt. I discussed at length that the industry has a motive for its corruption. I couldn't be more direct.

The scenario goes like this. One of the industries harshest critics makes a specific complaint about a safety system. The facts are; you don't know if I'd picked the information off your documents or was the information gleaned from a plant employee passed over the Internet. The agency for a fact, knows that I'd picked up employee discontent, with some of it being outside the norms of a typically unionization issues. Way outside the norms and very troubling. You know for a fact that Exelon is having widespread employees' troubles, with plant moral and employee and management error issues. We know as another fact, that corporate management has been in a distracting power struggle that was admitted by the CEO, and that there are legal suites pending questioning corporate financial integrity. There are even questions if this corporation has become one of those serial merger monsters- needing acquisitions to boost profits.

You know for a fact that this critic has picked up more than one threat about the possibility of economic sabotage- intentionally tripping a plant off line as a means of getting back at management. There is a lot of abnormal employee (Union, and Management) distress throughout the system. I directly indicated with the questions "I don't think you can rule out an intentional employee act yet" and "Do you have employee turmoil at this site", that I was questioning if this was an intentional employee act. It would be negligent of the agency in our current times of heightened national alert if; you didn't immediately pass these concerns into Peach Bottom and Exelon nuclear.

It should be noted now that the NRC is satisfied in their 2.206 response with the very shallow public inspection documentation of the safety issues concerning the leaking Diesels in the specific situation (LER 02-01-05), and with the documentation of other improper water, air, oil leaks and other leaks. There is no agency commitment to more completely answer to these questions.

It is a fact that I sent out the initial 10 CFR 2.206 on March 18, 2002 at 10: 20 PM to Mr. Dricks -(10CFR2.206 for TMI, LaSalle, Peach Bottom, Limerick and Oyster Creek). According to PB Inspection

Report 03-02 IR15 on March 19, 2002, Diesel Generator E-4 developed an oil spray leak from a failed oil line fitting leading to the shutdown from a test. It should be noted that PB discovered the degraded and leaking fitting back in Sept of 01- and they neglected to get it fixed for 10 months. The inspection report speaks of a very special abnormal "hand over hand" inspection of the oil tubing just prior to the startup of the unit. You know the NRC never specifically identifies the rationale and the characterization for the very special hand over hand inspection. PB says the hand over hand inspection disturbed the leaking fitting leading to the complete shearing off of the fitting.

What has happened, is the NRC had passed on the information in my 10 CFR 2.206 to Exelon and Peach Bottom. I am sure PB conservatively responded to my concerns with a detailed inspection and actual test of the unit, and probably all of the sites of the Diesel Generators, as a conservative gesture.

So here you got one of the NRC and industries fanatical critics declaring a safety concern. I provoke Peach Bottom into a very special inspection and testing of the machines. These guys stumble around further degrading the lube oil fitting leading to its complete failure. In other words, an outsider provoked the detection and repair of this broken component, in which the utility and the agency could not detect and correct on their own. Most astonishingly, before the stumbling around, the cracked fitting was documented and never repaired for 10 months. It was not accessed correctly initially. The NRC risk assumption is that the unit was degraded for over 30 days, and in an accident, the whole unit would have failed and not been recoverable. This, my friends is a reckless disregard for safety and is a strong indication of NRC corruption. If true, this would be highly embarrassing to the industry and the agency. It would give the motive for a cover-up.

As far as the NRC making a mistake in not entering this most recent 2.206; we know that intentionally structured mistakes and errors are widely used as a tool of corruption and maintaining non-accountability. It's an old elite game -with them thinking we are stupid, when a whole series of honest mistakes and unintended errors that "just happens to go their way over and over again"- is just coincidences. It's like WorldCom, just transfiguring 4 billion dollars from one column to another. Honest.

Error and mistakes; intentionally structured agency confusion; prehistoric bureaucratic organizational structures and document management (information technology) systems; budget resource problems that just effects the target area of choice; safety and risk analysis tool of such complexity that nobody can understand; the bureaucratic rules, laws, and processes of such complexity that even god couldn't understand; of a political system who is stagnant and blind to the needs of our most vulnerable; intentional acts of selectivity, omission and commission, leading to a predetermined outcome, which always favors one side; are all corrupt "intentional" strategized instruments of the highly educated. It's the most highly educated of us robbing a bank; except they use their high intelligence and advanced degrees as the stick-up gun. It's the smoke and mirrors, the curtains, the plastic confidence, the amplified voice of the Wizard of Oz. It's the innovated technology and plastic suit that hides the black-hole ethics of Darth Vader.

It is a crime against humanity and its breath is enormous! Millions of the innocent are effected. I know the policy of this comes from way up in the system-both democrat and republican. I know there is a lot of unexpressed controversy- within the middle and lower managers.

I know we all been habitized into talking about the positive aspects of your work and the industry. You need to spend more time in talking about your problems and your worrisome perceptions. You need to be trained in about publicly talking about industry uncertainty- instead of only expressing the absolute verified facts. You are "gaming" the system into expressing the facts, of what you spend the majority of your resources to establish the facts of your favor, and thus you express only a small proportion of the story.

The artificial happy talk needs to stop now. Nobody is going to like what I am going to say now, but you need to tell the whole truth no matter what the cost is. It's a matter of character and integrity. It's a matter of democracy.

It just sits as striking, this being your first error in putting the 2.206 in the tracking system. The agencies arrogant non explanation of how and why the error occurred, and not holding anybody accountable in

terms of a clear explanation, has become a perfect reflection about how you hold the nuclear industry accountable to transparency, integrity and the quest for truth. It just how you frame the argument using as little information as possible- so as to continues with your bureaucratic unaccountability. You have created absolute communication between your agency and the utilities, with a very highly structured and organized system of selective communication to the public and critics.

It's the old catch-2002. My opinion is taken off our (NRC) documents providing no new information-thus we are not required to be reflective about our first take on any incidence or situation. Or you have no objective proof of your concern. The trouble is, there is a huge long-term effort to prevent anybody, or me, from having access to the type of credible information that your process bureaucracy demands. Thus, your critics are prevented from accessing any objective independent proof- and your perceived anti American enemies are prevented from the ability of having a fair process. You are the gatekeepers of the evidence and the truth. You selectively dish it out for your advantage. You trade integrity for technical and ideological elitism, power, status, position and money.

It is reflective of our corporate economic system as a whole.

Sincerely,

mike mulligan

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