50-219

From: "Michael Mulligan" <steamshovel@adelphia.net>
To: "Victor Dricks" <vld@nrc.gov>
Date: 7/12/02 2:45PM
Subject: To Mr. Stuart A Richards, Director

Mr. Stuart A Richards, Director

Projects Directorate 1

Division of Licensing Project Management

Office of Nuclear Regulation.

Dear Mr. Richards:

This letter is in response to your letter dated June 27, 2002. Your letter was in response to my concern with the Oyster Creek tech spec change 298- about bypassing the refueling interlocks. That concern of my letter was dated June 14, 2002. I restfully request that this be entered into Adams.

I got to put this in a form in which I think the public will understand -so I will use my imagination. Let's say you (the agency) are a licensed operator at Oyster Creek. An accident is going to happen tomorrow, in which the facility will have to depend on the emergency diesel generators to power up the facility- meaning no off site power available during the accident. Your task today is to verified the equipment lineup of the #2 diesel generator. Tomorrow, during the pre-accident, it will be your responsibility to make sure the unit starts-up in the accident and connects to the safety bus.

Your (the agency) inattention to detail in the last few days has cause this unit to "fail to startup" in the accident- and it was a fairly simple switch that was inadvertently left out of position. The switch position was in the procedure to verify unit reliability and operability of the safety machine. It was simple mistake. The other DG started up, and the facility stepped out of the crisis fairly quickly.

Toward your last paragraph in your June 27 letter, you directed my attention to do an Adam's lookup using the term of "refueling" under Oyster Creek. You identified inspection report 50-219/200-003 as an inspection report that covers the last outage. Now should I assume it's 2000 or 2001. IR 2000-003 does not contain any outrage- maybe IR 2001-03??.

I have two choices, either using title or document search in the simplified search. Using the title search of the word "refueling", I get less than 10 entries, with not one including an inspection report. With the full text search (all dates), there comes up over 300 entries with seemly many inspection reports. I thumbed down to the IR 2000-003 with is dated in June 2000 something, and not an outrage to be mentioned. Ops, now I can't find an entry for IR 2001-003.

Your phrase "(for example, inspection report 50-219/200-03, dated December 20, 2000, covers the last refueling outage)" with the "covers the last refueling outage" raises issue with me. If your inspection report, which I don't have access with the cover page dated December 20- typically the refueling event is many month behind the cover letter- I'll assume the outage was in the beginning of Oct 2000. From Oct 2000 to the end of June 2002 of your letter, we got 21 months. Has Oyster Creek violated a Tech Spec of some sort without an outage in 20 months. That didn't get by all you people did it? Is that facility on a 24-month outage schedule?

Let's go over a few faults of Adams and Information technology mismanagement. I know you bravely have admitted of the faults with Adams, but nobody has been held accountable to the failed system of Adams. These is no doubt that the agency selectively portrayed and controlled information prior the Adams startup- and spoke of the happyland of meeting all of criteria of the project in the first year of operation.

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Add: John Boska

Let's use that little old lady using the system for the first time. How is she going to know what the docket number is for Oyster creek? She will have to fiddle around on your Internet site looking for the docket number or do a lookup of Oyster Creek on Adams. She is going to say -what the heck is the meaning of 5000219? She could understand that the plant is the 219th plant built or numbered- but what is the meaning of 5000. How come she can't go to a single Oyster Creek Internet page- with a simplified search engine that is only one button away. Why does she even have to know the insane 5000219- now is it two or three zeros?? Why isn't the facility named the "5000219" plant at the front gate? By the way, how can she figure out when the last refueling outage is and with the date of the cover letter of the inspection report having no relationship with when the outage occurred.

I wasted enough time with this. I did the simple search with the title, full text search, and using inspection report entry of the document type. The inspection reports are shown out of order with the sequence and the date. Some IR's are in some searches, missing in others, and some are just not in any of the search. We are lucky that congress has not tasked you with maintaining safety of a machine- with the responsibility of making sure a diesel generator would start up in an accident.

After spending about three hour playing around with this, I still have not an idea when the last outage was, and what was included in the inspection report about refueling issues. My bet is that the inspector had gone over superficially with the issues of the refueling interlocks. There would not be a complete list and short explanation of all refueling equipment and circuitry degradation and failures occurring during the last outage. It should be noted that I don't see any Inspection reports titled refueling- did you.

Like I been saying for years now, you seem to think I can intervene within some "official" process like a license amendment request; you've got that intervention highly proceduralized- and it would take massive luck for me to catch it in the federal register and within Adams. There is massive confusion within the agency personnel about documentation, and there is more confusion within your document management system. Even if I luck out enormously with finding an inspection report with a refueling section, the specificity of the section would not have any details such that I could intervene intelligently with the license amendment process. It is an enormous barrier to public participation- your agency incompetence.

You have a legal procedurized process of public participation- with not a chance of collecting the objective information needed for the rules of the legal process-derived by the agency's incompetence. It's a rat race. I can ask the NRC to get information or ask the utility for the same. Then we will communicate through the snale mail- with the potential of many intentionally inserted errors that is meant to frustrate the intervener- which ends up wasting an enormous amount of time. There would be many rules and rationales, and precedence, given as the excuse to no give out any information. It the old, if I don't have a legally binding requirement to give out the information, then why should I. It the old, if the information is not in my specific interest- my self interest- and reflects not well against me, then let them eat cake. It's a huge undemocratic barrier- and it is a huge public safety issue, with letting you guys make your self-interested deals behind close door.

Look, you people are highly educated and skilled- many with specific degrees and advance degrees also. Your are ten levels smarter than me. You have been working on the system for years. You know what is going on, you know the problems. You just choose to go along with your defective system, for what reasons. Many of you rationalize to yourselves that we just do not have enough personnel or resources, and that is your excuse to not effectively speak up. Any excuse will do to not stick your head up.

The truth is; this confusion, incompetence and selective resources tageted to specific interest, is intentionally structured by very smart men at high level executives. Many of you are flooded by excessive work, and many of you just don't have the guts to get them to limit your duties, such that you can realistically deal with your difficult work. Your bosses are immorally gaming the system and stealing, with many of you failing to engage, and putting a stop to this corruption. It is stealing of a high order, in that your are restricting and controlling information-creating a public illusion- for your own benefit- money in your pocket.

It's an intention failure of yours not to perceive and then act. Many of you play the "game" in your head by always looking at problems as isolated events, only looking at a problem within a restrictive containment that just benefits the priority of the bureaucracy -and there is a mental block with looking at the totality of your agency's problems. It is "gaming" the mental processing in your head. You smart and educated people do this intelligent stealing quite well. It is no better than pulling a B&E (breaking and entering)- with maybe the entry tools being your college degrees.

You are very smart employees. You have the intelligence and have the educational tools- never mind the experience- to comprehend what the problems are within your agency, and it is your responsibility for truth and integrity in your agency- no matter what the consequences are to you. That is you responsibility for living in a democracy and living in the greatest country on this planet.

Many of you have to make an assessment -if an internal NRC complaint has a chance to be effectively answered. I think we are way past that. There are other avenues, like congress and the media, and even the environmental groups. There is even the potential of making a complaint by the yahoo business message board. It isn't a matter if any of you individuals can make a difference; it's only a matter of you making choice.

What is that ageless Shakespearean phrase "to be or not to be- that is the question".

Sincerely,

mike mulligan

Hinsdale, NH