

**From:** "Mike Mulligan" <steamshovel@adelphia.net>  
**To:** <vld@nrc.gov>  
**Date:** 12/19/02 1:12PM  
**Subject:** LaSalle SPC

Mr. Dricks and Mr. Grant:

The withdrawal of the S/G License amendment request transcripts (ML023450323) from Palo Verde dated in adams on 11/25/02 raises issues related to my memo (LaSalle SPC) written to Mr. Grant dated 12/16/02. The sentence of issue is on page 18 of the transcript and on lines 21-25. Mr. Saporito is discussing about how he was talking to Mr. Donovan or Donohew of NRR, and they came to an agreement about the poor state of characterizations with the SG technical specifications.

I wish that you would include this in the LaSalle SPC memo. Now I question if NRR has the ability to interpret accurately design and operational regulatory wording on a national level. And that is a huge safety issue! Does NRR only look at ambiguous plant rule wording on just an isolated case by case base, and not ever think about this as a generic safety concern? Are we seeing the shadow of moneyed interest?

"We don't believe that the staff acted appropriately based on the fact that the NRC, through Mr. Donahue's office, confirmed to us, in fact agreed with us, that the TS as they currently exist for Palo Verde Steam Generator Unit 1 are ambiguous."

"So the NRC staff acted to grant the licensee's withdrawal of the LAR based on erroneous and ambiguous technical specifications that currently exist."

So we are beginning to understand about how ambiguous wording of the plant design documentation and Tech Specs throughout the industry, are leading a large state of confusion for everyone. I believe the UFSAR and Tech specs wording have been politically arranged by the utilities in recent years and the results of this is increasingly becoming clear. The net result is the industry is making the regulatory control wording more ambiguous and we have become less specific with safety requirements. This is a result of all the mindless utility resources that has been lined up to reduced requirements and increase plant capacity factor through the recent years.

Let me tell you what has happened -there are signals that are being sent both ways. If the NRC accepts widespread ambiguity in the ways these

plants are controlled in regulations -and I might add, the ambiguous wordings is intentional- then the utilities will think all rules, standards, and reporting requirement are ambiguous, and they then they only have to disclose issues if it is in their self interest and in they way the utilities want to. That is what is happening here with Davis Besse.

Sincerity,

mike mulligan

Hinsdale. NH