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FROM:
Mike Mulligan

TO:

VLD

FOR SIGNATURE OF : ** YEL **

DESC:

Safety Concern at Braidwood and Byron:
the submittance of inaccurate documents too the
governmental

ROUTING:

Collins
Borchardt
Sheran
Case
NRR Mailroom

ASSIGNED TO:

CONTACT:

DLPM

Zwolinski

SPECIAL INSTRUCTIONS OR REMARKS:

From: "Mike Mulligan" <steamshovel@adelphia.net>
To: <vld@nrc.gov>
Date: Fri, Jan 17, 2003 1:40 PM
Subject: RE: Safety Concern at Braidwood and Byron:the submittance of inaccurate documents to the governmental

Mr. Dricks,

In the case of MSSV'S, the ASME testing regime in Boiler and Pressure Vessel Code,Section XI, inservice testing requirements - does not accurately capture the amount of time a MSSV is in a broken state and does not clearly identify that more than one valve is degraded at the same time. You only catch it at the end of an operating cycle and there are very little consequences -so it happens over and over again. The out come of this is that this facilitates the repetitive failure of these very important safety components and the licensee's have no idea what the real cumulative inaccuracy and failure rates over time (real risk). The ASME testing regime creates a grossly false picture of the component reliability -and this is what is preventing you from fixing it right the first time. Further, the utility and NRC inability to figure this out on their own indicates a further serious decline in the national nuclear safety climate.

I want to know is the ASME god? The ASME testing regime gives a false impression on component reliability and thus they are facilitating a falsification to the public.

Thanks,

mike mulligan

Hinsdale, NH

The MSSVs are tested each cycle in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code,

Section XI, inservice testing requirements.

-----Original Message-----

From: Mike Mulligan [mailto:steamshovel@adelphia.net]
Sent: Friday, December 20, 2002 10:43 PM
To: vld@nrc.gov
Subject: Safety Concern at Braidwood and Byron:the submittance of inaccurate documents to the governmental

Mr. Dricks,

Between Byron and Braidwood, we are concerned with a similar set of wording. We "know" the Commissioner's have raised issues with the regulatory philosophy of being too "subjective" or not being "objective" enough. This exposes the problems of being too objective- and it can't be forgotten in this that it undercounted the nature of the problem.

What you have here is generally more than one safety valve failure in a LER, in an event. It seems the plant's removed one valve at a time for testing. When a deficiency is discovered, they repair it and reinstall it, and then move onto testing the next valve. A series of testing valve failures might occur within a few days and hence the:

LER 454-2002-001-01 -"Because the MSSVs were tested sequentially, only one valve was "known" to be inoperable at any one time."

Microsoft Bookshelf 98:

know (no) verb

knew (n*, ny*) known (non

1. To perceive directly; grasp in the mind with clarity or certainty.
2. To regard as true beyond doubt: I know she won't fail.[1]

I wonder what the utility's definition of "one time" means? From now on, I request that all safety valves, either the installed valves or the ones who are waiting in standby be tested at the exact same time. This has become the only way for the utility and NRC -to get a fair representation on multi-valve system failures because of regulatory defect of being too "objective".

Being too hyper material objective with this gives you the outcome that you have no material evidence (proof) available to get you to the conclusion that more than one valve were inoperable at one time. The other false game they have played in the past -is seeing how it was discovered while the plant was shutdown (there is no other way); they characterize it in public documents as discovered while shutdown and not having any effect while the plant was operating. Now our intelligent

subjective mind tells us that with testing multiple identical valves in the same system within a few days and the system status (shutdown) not being changed, you can come to the safe conclusion that the failed valves were simultaneously inoperable for a length of operating time.

Can you imagine the cost and how complex it will become, if the utilities have to come up with a hyper objective testing regime that will accurately capture the question of: how many safety valves where inoperable at one time? My only solution to this is to test all valves at exactly at the same time and in the same place. What is yours?

I don't understand why they worded it this way. Its characterization is clearly deceptive and false. It would even be a bigger ethical problem if they entered only one valve at a time into a safety analysis-instead of all three valves that were inoperable at the same time. A phrase like this is generally inserted in the document for a specific reason and motive -what is it? Is an inaccurate phrase acceptable in a document that is going to be submitted in to the government?

It bigger than an isolated event for Exelon because it occurred across two plants. As we know, a document like this goes through many hands at the plant indicating it is not an isolated individual issue. It's troublesome because there is a decline in plant performance at one of them. I have no need of any confidentiality.

Thanks,

mike mulligan

Hinsdale, NH

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