

TAC No: MP 7285
John Z/Ad
Raf Mendola
Yvonne
G. Dick
Dw. Sec.

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FROM:
Mike Mulligan

TO:

VLD

FOR SIGNATURE OF : ** YEL **

DESC:
Byron and generic safety concern

ROUTING:
Collins
Borchardt
Sheron
Case
NRR Mailroom

ASSIGNED TO: CONTACT:
DLPM Zwolinski

SPECIAL INSTRUCTIONS OR REMARKS:

From: "Mike Mulligan" <steamshovel@adelphia.net>
To: <vld@nrc.gov>
Date: Sat, Jan 18, 2003 12:31 PM
Subject: Byron and generic safety concern.

Mr. Dricks.

The issues of failed MSSV's are beginning to raise more large cultural safety problems again at Exelon and the NRC. Byron speaks of initially only testing according to code, with them then picking nine valves to test. Byron admits that they have a large historic problem with sticking relief valves. Their initial safety instincts of just testing to code are very worrisome. With their historic record of problems with MSSV, I can't understand why Byron didn't initially schedule all of the valves to be tested and the failed valves to be fully disassembled and inspected by experts -with the results available before startup.

That is called conservatism. Does the ASME set a limit on how conservative Byron must be? Isn't there a recent information notice about not doing a full valve disassembly (SRV) inspection for twenty years and about nuts being loose? Isn't there a lesson from Davis Besse about setting your safety culture up to only meet the minimum code and procedural requirements?

I mean in the ASME, if Byron had ten cycles with 50% of the valves tested as broken - would the next cycle only demand 4 valves tested. I mean, if another good plant had no valve failures in a decade -would they have to test a similar percentage. You see how advantageous they made it for a poor performing plant.

In historic record with Byron's MSSV's you can make a prediction that more than one of more valves would be broken before the end of the last operational period. The question is, did you go out of your way to discover this "expected" non conformance, or did you just depend of the inadequate requirements of the ASME codes. In other words, you tested on March 7, but on March 6, you should have been in a LCO statement with three broken MSSV's. That is what the subjective reality is about -but I have got no objective proof of it? This is what this sequential game of testing valves and the pretend game of never discovering more than one valve at a time being broken is about. I wonder if your employees are playing other pretend games in other areas. What are you teaching your employees?

I have got a question. I don't know how you pressure test these valves. If you during the test, you bring up pressure slowly until the valve lifts, this raises questions with me. In the worst case accident

pressure spike (a much faster rate of increase), I am wondering if the inaccuracies would be much higher. In other words, are the rusting, sticking and freezing characteristics, such that on a quick pressure spike, would the lift set point be much more higher. I mean, have you got any detailed engineering studies and testing about the valve accuracy characteristics with this oxide bonding. I'll bet its propriety.

I am going to do some guessing here. You have a long term design defect with the MSSV's. You people know that you could cycle these valves every quarter or half cycle -to tamp down the valve lifting inaccuracies. My bet is that this cycling would cause pronounced valve leakage and force shutdowns. These valves aren't durable enough for their intended service -hence always testing at the end of a cycle.

I will give you the bottom line. You have a couple of design defects that are active in the valve and they are coming into conflict with the safety aspects of the component. You are afraid it will impact the ability of the plant to stay up at power. To keep the puzzle together, you are forcing your employees to lie for you and down playing the public risks. And that is my largest safety concern -it's in the heads of your employees. We recognize this has large generic implications.

Thinking about a 2.206?

Thanks,

mike mulligan

Hinsdale, NH