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FROM: DUE: 07/21/05

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FINAL REPLY:

Mike Mulligan
Hinsdale, New Hampshire

TO:

Chairman Diaz

FOR SIGNATURE OF :

** GRN **

CRC NO: 05-0318

Dyer, NRR

DESC:

ROUTING:

2.206 - Exelon's Nuclear Power Plants

Reyes
Virgilio
Kane
Silber
Dean
Burns
Collins, RI
Caldwell, RIII
Cyr, OGC
Skay, NRR
Goldberg, OGC

DATE: 06/16/05

ASSIGNED TO:

CONTACT:

NRR

Dyer

SPECIAL INSTRUCTIONS OR REMARKS:

From: "mike mulligan" <steamshovel@adelphia.net>
To: <allegation@nrc.gov>
Date: Sun, Jun 5, 2005 5:16 PM
Subject: 2.206 against Exelon

Chairman Nils J. Diaz, Ph.D.

Nuclear regulatory Commission

Washington, DC 20555-0001

Dear Chairman Diaz,

I request a 2.206 on all of the Exelon's fleet of nuclear power plants -with a focus on the Byron plants. I request you enter this 2.206 in all of Exelon's dockets -especially in Byron's Adams. I think what this represents is a national nuclear safety cult/culture of intimidation -with the utilities ganging up against the NRC.

I request that all the Exelon nuclear plants be shutdown after 6 months -until such time as Exelon provides a complete historical report on what went wrong with the nuclear industry from the 1960's through the 1990's. You could begin by explaining what happened at Zion -was that a result of "regulatory uncertainty"?

I request that Exelon be prevented from participating in the design and construction of the next generation of nuclear power plants -until they provide a complete and truthful historical report on what happened to the nuclear industry prior to 2000. Distorted Speeches under congressional testimony doesn't engender trust to me. I suggest that we look at the perspectives from the utilities, NRC, state regulatory and environmentalist points of view -economics and safety sides of it.

Marilyn C. Kray

Vice President Exelon Nuclear

and President NuStart Energy Development

Testimony in the Senate Environmental and Public works
Committee/Subcommittee on the Clean Air, Climate and Nuclear Safety
Committee on 5/26/05.

http://epw.senate.gov/109th/Kray_Testimony.pdf

Excerpts from Marilyn C Kray speech...

"During the 1980's, nuclear power plants were plagued with significant cost overruns due in large part to the regulatory uncertainty inherent in the NRC licensing process. Many major issues were argued and litigated only after the plants have been constructed, in some cases delaying plant operation for years."

First, "regulatory uncertainty" is a generally recognized political corporate code word from the "I hate the government crowd"; in that this is a campaign contribution effort to destabilize the regulatory authority of the United States government. It is extraordinarily anti-American at its heart.

Functionally, in the upper mid west, the electric grid reliability was destabilized as expressed in the balkanization of the grid authority oversight responsibilities leading to the huge 2003 northeast blackout. Generally, the utilities of the upper mid west had become anti-American -as with many other USA utilities. In this area, they exerted political pressure toward running the grid in an increasing disorganized manner and causing increasing blindness to the oversight authorities. There were pressures to maintain antiquated grid oversight technology and regulatory power as the means to maintain self-interest (profits) over regional grid reliability -balkanization as expressed by the Federal Reserve System report.

Generally, the theme of Mrs Kray speech expresses the wide spread industry unethical intimidation of the NRC -with blaming the agency on the all the problems in the industry. Mrs. Kray doesn't explain how the poor performance of the in the early years from the individual utilities, the nuclear plant architects and construction companies and plant designers and engineering staffs created the prolonged opportunity of failure for the industry and the NRC during those times. Fundamentally, the nuclear industry had a huge loss of public confidence -much of it caused by shooting themselves in the foot during these early years. Utility incompetence and political interference across a broad spectrum drove the regulatory uncertainty -meaning utility incompetence created the necessity of a low industry capacity factor and the repeated hair raising accidents cumulating in the TMI resulted in the massively costly addition of safety equipment and components. In the resulting collapse of public credibility during those times, the politicians were forced to over regulate this industry if they wanted to stay in their jobs -and re-regulation became a necessity for the industry's survival in the public mind. It's a flat out lie implying "regulatory uncertainty" was the primary driver with early problems of the industry.

I might remind the rest of the world, whom has great plans for developing nuclear power in the future -if you are or are becoming a transparent democracy -it would be cheaper for you in the long term to construct and design your plants right on the first take. This public backlash can become extremely expensive and embarrassing on the political side of it -it can

permanently wreck the credibility of the nuclear industry in your countries.

Mrs. Kray's selective blame of the NRC "regulatory uncertainty" for the early problems of the nuclear industry parallels the typical industry strategy of silencing the whistleblowers -in the exact same framework as in this testimony for improperly blaming the NRC for the industry's past problems. Generally, the unethical tactic is the plant's gather incomplete selective negative information on an individual who raises safety concerns, and use their enormous powers to overwhelm her concerns. They corrupt utilities do this in an attempt to influence outsiders and intimidated the person who has raised safety concerns -even more of a concern, to intimidate future whistleblowers in an attempt to turn the concerned individual into a bad person. These plants typically withhold safety information that might bolster the issues and credibility of that concerned employee. Mrs. Kray is pointing an intimidating finger at the NRC -saying the problems of the early nuclear industry is all the agency's fault.

She and the industry is implying that if you don't agree with me -we will use the full force of industry's political connections to make sure the NRC's high officials agree that is was their fault independent of the evidence and the truth. They are surely re-writing history in the George Orwell 1984 method in congressional testimony here folks.

It is an abuse of power to inaccurately frame an issue for self-interested reasons in a public policy decision arena. It is an abuse of power to selectively destroy an employee's career through providing selective and inaccurate information about his concerns. It is a huge national nuclear cultural safety issue with inaccurately rationalizing the problems of the early nuclear industry years, by blaming the government of the United States for these problems. What you got here is the utilities are intimidating the government of with their anti American propaganda -and the NRC is going along with this lie. They pull this very same strategy to internal concerned employees in this selective blame game. The secrete justification of this immoral policy comes within the potential cost of trillions of dollars of ratepayer's monies and huge corporate profits.

I want you to know that this is a grave failure of the NRC, for not standing up for the truth -no matter what the individual and agency cost is within a national energy policy debate. The NRC has failed to stand up for the public interest and truth telling -this abuse of power has the potential to intimidate all the nuclear plant and agency employees. It's showing all the nuclear employees that corrupt political interest has the ability to override all of our national laws, rules, policies and truth telling in a congressional hearing -in defense of an unprecedented concentration of corporate powers as identified in Nustart. It is telling the nuclear employees that if you tell the truth contrary our "single vision" and self-interest -your constitutional protections can be trampled by our powers. Matter of fact, the corporate interest is demonstrating that we can smash the fundamental interest of the public - so what chance do you have -you are just a peon against our powers. It is showing the public, that if you got a potential sum of money to spend in terms of trillions of dollars -then a fair political process and the terms of our Constitution can be overridden in defense of corporate self-interest and individual profits. What sane person would legitimately stand up to that power. It is monied tyranny of the highest order!

I request that all the congressional members of the Senate Public Works Committee and the subcommittee on Clean Air, Climate and Nuclear Safety resign from their committee assignments because of their inability to maintain standards of truth telling in testimony -in the face of corporate financial and political pressures. I want the committee members to understand they failed to stand up for truth telling on a grand scale. They have abused the meaning of their constitutional responsibilities.

All I need is a written response in Adams and I expect the senate committee to answer this also.

Thanks,
mike mulligan
Hinsdale, NH
16032095910

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Subject: 2.206 against Exelon
Creation Date: Sun, Jun 5, 2005 5:15 PM
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