

EDO Principal Correspondence Control

FROM: DUE: 09/07/05

EDO CONTROL: G20050545
DOC DT: 07/24/05
FINAL REPLY:

Mike Mulligan
Hinsdale, New Hampshire

TO:

Chairman Diaz

FOR SIGNATURE OF :

** GRN **

CRC NO: 05-0394

Dyer, NRR

DESC:

ROUTING:

2.206 - Pilgrim

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

DATE: 08/03/05

ASSIGNED TO:

CONTACT:

NRR

Dyer

SPECIAL INSTRUCTIONS OR REMARKS:

Template: SECY-017

ERIDS: SECY-01

From: "Michael Mulligan" <steamshovel@adelphia.net>
To: <allegation@nrc.gov>
Date: 7/24/05 12:16PM
Subject: Pilgrim 2.206

Chairman Nils J. Diaz

Nuclear Regulatory Commission

Washington, DC

Dear Chairman Diaz,

I request a 2.206 on the Pilgrim nuclear plant cell phone camera recorded sleeping event.

We think the fratricidal rule warfare as seen in the Pilgrim control room sleeping incident was investigated incorrectly leading to a wrong conclusion by the NRC. The punishment just might have been intended to protect the nuclear industry and not dish out justice. The punishments of the employees fits the idea of protecting the industry from a public backlash –but doesn't get to a deeper public understanding of what was the cause. I think the career assassination of both employees was designed to protect the true degraded conditions of Entergy management and the inability of the NRC to correct cultural defects before showing up as a serious incident –a precursor to a big issue corporate wide.

We think the increasing concentration of nuclear power plant ownership in the mega nuclear corporation is at the bottom of that. Too much power has been granted to the owners of the power plants leading to widespread employee intimidation and a sense of them being powerless to the mindlessness of the corporation – overworked and overstressed...and beholden to maintaining a high capacity factor and profits. We think there is a new structural failure in the nuclear bureaucracy within these mega mergers and plant purchases that is just showing up—where the systemic failure of the organization is turned into a mindless low level employee rules violations and career assassination, and mid level employees can be targeted for the vice themselves.

We think there is a need for new independent employee protective structures – investigative, legal and regulatory -to be developed to counteract the increasing concentration of power within these mega corporations and to empower these employees to uncover and correct these developing defects without intimidation of any sort. The theme of nuclear corporate mergers and plant purchases has concentrated and intensified management power -while there has been no change in the power structure of the mid and low level

employees

We think there are enormous stresses building up at the lower levels of plant employees –and it's a new type of stress never seen before in the industry –and thus the necessity of employee and management rule warfare. I think there is going to be an intensification of this in the coming years.

What is the big problem, that in accidents and events in the fratricidal plant, the employees will be excessively consumed with protecting their careers from their angry cohorts –instead of using their full attention with protecting the public? Further, if there is excessive employee frustration with management – the employees won't proactively identify component degradations –as a way to get even with management.

I am appalled at the length of the OI investigation and its accuracy –and the sense of disinformation given to the industry as a whole in the reports, and most important to the public.

I request an emergency independent investigation outside the NRC and OI of the events leading up to both sleeping incidences at Pilgrim. I request an independent investigation of the culture of all Entergy's nuclear power plants and to be culturally polled –and the uncovering of the deep seated causes that is involving these employees.

I request that Pilgrim be shutdown until the safety of the management and union culture can be assured....

Thanks,

mike mulligan

5 Wood Lawn Lane
Hinsdale, NH

16032095910

(I am getting some indications of deep seated employee resentment of Entergy at Vermont Yankee..... and I am getting this word from highly educated and professional people)

.....Well, the psychologist tells us we all lie -I certainly do on occasions. Maybe the biggest liars are the ones that tell us they don't lie. You must call it by another name I guess.

You understand what is going on here. You got a citadel of a bureaucratic of rules. Many times the corporations forced the construction of the citadel –with sicking their lawyers onto the NRC inspectors forcing the construction of the rules. Then there are so many rules that nobody can understand what

all the rules are saying.

Many of the managers end up not being able to understand right and wrong other than through the filter of the rules. They get this arrogance, whereby they think they have superior ethics because they follow all the rules and never misdocument a situation. This superiority is a facade because they think following the rules becomes perfect ethics –all that game playing that hides more that exposes doesn't count in their system of morals...because it accepted by the rules.... As we see here, he uses his rule based superiority as an intimidation tool that is intended shame another person. It sounds like he has become pretty skilled with using his superiority... This illusion of absolute integrity is repeated over and again within the organization, many managers get involve with this cult like behaviors – when believed on face value, it becomes a horrible intimidation tool used against the rest of the humans in the organization.

It becomes a wonderful shield for the behavior going on behind the scenes...there seems to be top level training on how to do it....

So you got the verbal façade of perfect ethics...but something less than that in reality. This is the genesis of the fratricidal policy and rule warfare that goes on at these sites –as witness with the pilgrim sleeping and recording of it by cell phone.

"That RO went into that control room under a head of steam -it didn't just happen under a spur of the moment thing.

What we know for sure now is technological transparency has the power to confront the culture of a plant. Should everyone carry a camera cell phone at a nuke plant...?

Typically this reminds me of an operation's department fratricide. There is the sense that the line of rule and policy limits are blurry -meaning that the insiders know that on some situations that plant outsiders could consider a situation as being a rule or policy violation. Generally, the manager feels a sense of a loss of control and a need to maintain power over the troops -where they use employee rule violations and evals as the punishing meaning of maintaining control. This sets up the idea that the selective persecution of rule violations as the means to maintain power. The employee knows that management is not perfect -and many situations there is a real management violations or outsiders could consider it a violation. So it becomes open rule warfare between segments of the operation's department.

I guess you fire one from management and one from the non management -hoping this will return everyone to sanity.

To be fair -I was accused with falling asleep openly in an assigned busy

work office with many people coming and going -and just hanging around -during a whistleblower suit(5) that ended my employment at Vermont Yankee."

..... Everyone understands what we got going here is class warfare at its worst. It is the nuclear industry's rendition of the catholic "medieval inquisitions" and phony integrity trails based on preventing a catastrophic nuclear accident and saving the community. Most of what goes on here is done behind closed doors... It's horrific employee intimidation on a national level.

The lower paid employees are the ones who fill out the logs, while the executives engineer with their lawyers the "I'm so stupid defenses". So the high paid executives cling together in groups -create all sorts of special interest groups that interacts with the political and regulatory system on creating rules that proactively absolves the executives of the worst accidents -at best the little guys have the powerless unions. So the executives make breathtakingly wrong non documented decisions in their wood paneled back rooms. They have been told to stay away of putting their rationales on paper, or basically minimize putting anything on paper -where the lower classes hourly routines are based on documentations.

Everyone understands the higher you go up in the hierarchical organizations -obscuring the truth becomes a conscious professional actively and is highly valued with compensations and bonuses. It's valued more so after the accident... that turns the lesson learnt of the accident into a cover-up of national proportions... NASA challenger and Columbia.

The NRC executives term it as a communication problems as in Davis Besse -as the industry created laws and rules more that obscures the truth and exposes problems. In the real sense -they talk a good game- the laws and rules become the upper limit on their highest ethics and morality -as I've talked about in the past, it creates systemic industry wide blindness -instead of thinking this doesn't fit with what my heart and mind is saying -I don't care what the rules and laws say.... This is not right and I am going to fix it.

Everyone should understand we are involved in a lie of enormous proportions with the NRC on Davis Besse - the executive and congressional political sectors are clearly involved. Everyone should understand that rules were created to make barriers of understandings -that said to all the employees in the industry: you need not to consider what's beyond this artificial legal, cultural and political barrier -all the employees agreed with that because it was easier than making a stink. That the communication problem that the NRC talked about in Besse was intentionally created by political intervention paid for by the utilities and the industry...indeed the whole

corporate sector.

It's a lie of such enormous proportion –it calls forth the next accident that may destroy the nuclear industry....

And more of a problem, it identifies the same components of the institutional national recurrent political failures in our recent technological, security and economic past accidents....NASA, 9/11, TMI and Besse...and the war in Iraq....Don't you get it, if we don't anticipate the future...and intentionally craft these institutions and governments for the needs of the future.... actively participate in the cutting edge of reality (the right now).... then the preventable catastrophes will get us to evolve in a most costly manner....

Mail Envelope Properties (42E3BED1.5DD : 24 : 26077)

Subject: Pilgrim 2.206
Creation Date: 7/24/05 12:15PM
From: "Michael Mulligan" <steamshovel@adelphia.net>

Created By: steamshovel@adelphia.net

Recipients

nrc.gov

OWGWPO02.HQGWDO01
ALLEGATION

Post Office

OWGWPO02.HQGWDO01

Route

nrc.gov

Files

MESSAGE
TEXT.htm
Mime.822

Size

10669
21620
35529

Date & Time

07/24/05 12:15PM

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard