

From: Diane Screnci *RT*
To: James Wiggins
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Subject: Fwd: FW: Press Release

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From: "Weil, Jenny" <jenny_weil@platts.com>
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Subject: FW: Press Release

Press Statement of Gary Sullivan

I am Gary Sullivan, President of Local 369 of the Utility Workers Union of America. Our union represents nearly 80% of the workers at the Pilgrim Nuclear Power Station. Over the past few months, the Union and Pilgrim's owner, Entergy Nuclear Generation, have been engaged in intensive negotiations over the terms of new collective bargaining agreements.

While we have made some progress, our efforts have not yet resulted in an agreement. With great reluctance, our membership has voted overwhelmingly to authorize a work stoppage as of July 13.

With its trained, experienced, and dedicated staff at the controls, and monitoring and maintaining the equipment, Pilgrim is as safe as any nuclear plant in the United States. Entergy plans to continue to operate Pilgrim, even though the vast majority of its well-qualified and experienced workforce will not be on the job during the work stoppage. The company intends to do this through a so-called "contingency plan."

Over the past few weeks, we have been gathering information concerning how Entergy plans to run the plant without its workforce. The plan calls for the replacement of Pilgrim's experienced workforce with a combination of Entergy Nuclear management, outside contractors, and workers from other Entergy nuclear plants. This proposed

workforce-by-committee will not possess either the experience or plant-specific knowledge needed to operate Pilgrim safely, or in compliance with the Plant's operating license.

In order to ensure that public safety is protected, we intend to file with the United States Nuclear Regulatory Commission a petition asking that if the strike occurs, Entergy be directed to keep the Plant shutdown to protect the safety of both the workers who remain on-site and the residents of the surrounding communities. I am joined today by David Lieb of the Washington, D.C. law firm of Spiegel & McDiarmid, which is assisting our Local in its work before the NRC.

Our concerns with Entergy's contingency plan include the following:

- Under Entergy's operating license and operating procedures, Pilgrim workers are required to meet certain standards for the selection and training of nuclear power plant personnel. Many of the staff upon whom Entergy plans to rely to operate the plant in the event of a strike do not meet the qualifications set forth in the Pilgrim operating license and the company's NRC-accepted operating procedures.
- Entergy's Pilgrim operating license requires the Company to have a five-member fire brigade on-site at all times. If there is a work stoppage at the Plant, Entergy cannot meet its license requirements with respect to fire brigade staffing. There are sixty union members qualified to serve on the fire brigade, but only eleven Entergy management personnel who are qualified to do so. Entergy will not be able to rely on security personnel,

some of whom are trained to serve on the fire brigade, to supplement these inadequate numbers. Although they are not members of Local 369 and will not be on strike themselves, Pilgrim security personnel intend to honor the strike by not performing work that could be performed by a Local 369 member.

- In violation of standard operating practice, Entergy's contingency plan calls for the replacement of experienced reactor operators with personnel who have no hands-on experience at the Plant controls. Entergy intends to use senior reactor operators from Pilgrim to replace the current contingent of reactor operators. At Pilgrim, most of the senior reactor operators have little or no hands-on experience operating the Plant's control board. We think it is imperative that the people turning dials, pulling levers, and reading gauges and meters at the nuclear plant have experience in these tasks.
- Throughout the Plant, significant surveillance and testing functions are being performed everyday that are dependent upon the experience of the existing workforce. Under Entergy's plan, persons that do not have the requisite experience will be performing these testing procedures. There are safety concerns associated with performing certain tests, as the failure to perform them correctly can result in an automatic shutdown of the Plant, or the provision of inaccurate information to those who rely upon the test results to make critical judgments.

- Like most nuclear plants, Pilgrim has a “master equipment list,” which allows a user to look up a piece of equipment and determine its component parts and relevant maintenance history. The master equipment list is substantial, as there may be anywhere from 300,000 to 400,000 component parts in a nuclear plant. Pilgrim’s master equipment list is incomplete and in the process of being updated. Until these efforts are successfully completed, maintenance work cannot be properly planned based on the contents of the master equipment list. By analogy, it will be impossible to navigate the plant properly without an accurate map. Pilgrim’s experienced workforce is well aware of the limitations of the master equipment list, and, because of direct experience, will know the extent to which the list information tracks the actual status of a given plant component. Contractors brought in to perform the same functions on an *ad hoc* basis will not have that experience-based knowledge. Significant problems may arise to the extent that outside contractors or others without Pilgrim-specific experience seek to perform maintenance tasks based on inaccurate configuration information.

We are continuing to develop information to be presented to the NRC on these and other issues. We will ask that the NRC address our concerns on an expedited basis, and we are confident that the NRC will do its job and protect public health and safety.

In the meantime, we will continue to bargain in good faith and work tirelessly to obtain a fair contract for our members. We understand Entergy's motivation in continuing to operate Pilgrim, despite a work stoppage. However, the Plant is not as safe when put in the hands of personnel who do not have years of Pilgrim-specific experience to draw upon as they make minute-to-minute judgments about what needs to be done to ensure safe and reliable operation. The public interest demands that the reactor be shutdown if a work stoppage occurs.

Thank you very much. I will be happy to answer any questions that you may have.

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