From: To: <DJV@nrc.gov>, <EXN1@nrc.gov>

Sun, Feb 15, 2004 11:19 PM

Date: Subject:

PSEG internal report—URGENT——PLEASE SHARE WITH HUB MILLER

Dave and Eileen,

Last week I sent you a copy of an internal PSEG Nuclear document, a newly written Level 1 Root Case Report on "Uncorrected Global and Interactive Organizational & Programmatic Issues." If you need another copy, let me know.

The report makes no mention of SCWE issues. Instead, it focuses on other issues plaguing the Salem and Hope Creek sites, issues clearly within the jurisdiction of the NRC.

While it is full of acronyms and somewhat difficult to follow, I read it closely tonight. I wish I had read it in detail before now.

It basically says this:

- 1. Senior managers, managers and supervisors do not assure that site activities are performed in accordance with PSEG Nuclear procedures.
- 2. Managers responsible for fixing organizational and programmatic (O&P) problems cannot do so because they have "inadequate knowledge" and inadequate follow-through. Basically, they cannot "fix" what they do not "see."
- 3. A lack of accountability is considered the "root cause" of many site issues.
- 4. Management ineffectiveness, strategic errors in business plan execution and lack of accountability impact plant reliability, nuclear safety and personnel safety—although the impact isn't specified in the report.
- 5. There is failure to use and follow procedures AT ALL ORGANIZATIONAL LEVELS—including Plant Managers, Vice Presidents, CNO, and above.
- 6. People rely on others to do a better job than they do themselves; as s result there is overconfidence, lack of thoroughness and attention to detail, complacency, and lack of required double-checking (QV&V, self-checking, independent verification, etc.).
- 7:-The list of technical/near-miss events cited in the report makes all of—the above clear, compelling, and in need of urgent attention.

When one looks at this report in total, and from a nontechnical vantage point, the following could be said in summary:

1. The Salem/Hope Creek site is led, run and staffed by people who:

Do not follow procedures

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Do not fix problems

Rely on others, not themselves, to be thorough and give attention to details

(and those people relied upon rely on others to be thorough---thus no one is really being thorough and paying attention to details!)

2. Things are getting worse, not better——"the frequency, number and potential severity of human performance and equipment problems has increased over the last 6 months." The report says:

MANAGEMENT [WILL] BE RESPONSIBLE IF SOMEONE DIES OR IS SERIOUSLY HURT.

SUPERVISION [IS] IRRESPONSIBLE, NEGLIGENT AND LEGALLY RESPONSIBLE.

3. LUCK/GOOD FORTUNE/DIVINE PROVIDENCE is the only thing saving the site from a disastrous event.

This is a most damning report on SALEM/HOPE CREEK. It is current. It is written by a PSEG Nuclear employee with a lot of integrity, insight, knowledge and documentation.

I am concerned, and frankly scared, that all the NRC oversight in the world cannot counteract the extent of these failings. Therefore, while well intentioned, Hub Miller's promise to me that on-site NRC inspectors will "step in if necessary" to avert an unsafe act is inadequate and insufficient. The failings are so widespread that inspectors cannot be replied upon to "catch everything" that is awry and potentially dangerous.

My "read" is that this report basically says it is only a matter of time before someone is seriously hurt, killed, or a nuclear event happens.

Why is the NRC allowing the Salem/Hope Creek units to be operated under such conditions?

Why isn't the NRC taking the keys away?

One year ago, one of PSEG 's own Directors expected the NRC to take such action.

And we have proof things are now worse, not better.

The report says the people who work at Salem/Hope Creek are increasingly at risk, as is the general public.

Please act....NOW....don't wait for some arbitrary deadline or company report.

No matter what PSEG writes or tells you, these issues are real. So are the dangers they represent.

The NRC must exercise its responsibility and authority.

Further delays endanger all of us.

Act NOW.

MAKE 'SAFETY FIRST.'

Please.

I would appreciate hearing from each of you--and Hub Miller.

Thank you.

Kymŋ

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