

Jonathan Rowley - Re: comments in writing

From: Raymond Shadis <shadis@prexar.com>
To: "Jonathan Rowley" <JGR@nrc.gov>
Date: 01/10/2008 8:18 AM
Subject: Re: comments in writing
CC: Dave Lochbaum <dlochbaum@ucsusa.org>, <noverflo@aol.com>, Karen Tyler <ktyler@sdkslaw.com>, "Ulrich K. Witte" <Ulrich@ulrichwitte.com>

Mr Rowley,

Here follows in plain text, my comments. They are also attached in letter form as a MsWord Attachment. Thank you for including them in the record.

Raymond Shadis

Raymond Shadis

Post Office Box 76, Edgecomb, Maine 04556
 (207) 882-7801 E-mail - shadis@ime.net

January 10, 2008

Jonathan Rowley, Project Manager
 Projects Branch 2
 Division of License Renewal
 Office of Nuclear reactor regulation
 U.S. Nuclear regulatory Commission
 Washington, D.C. 20555-0001

Dear Mr. Rowley,

On January 9, 2008, you requested by e-mail that I repeat in writing comments that I made to the Staff following a January 8, 2008 Category 1 NRC meeting with Entergy Nuclear Operations to discuss a request for additional information in the license renewal review for Vermont Yankee Nuclear Power Station.

As I was not speaking from notes but simply responding to what I heard regarding stress and aging analysis of VYNPS reactor internal components in the meeting, I cannot reproduce my comments verbatim at this time without referring to sound recordings that were made but which I have yet to access.

I will nonetheless attempt to summarize my comments and hope that helps.

What I observed in the meeting was that the licensee did not appear to offer technically defensible justification of component sample selection, substitution analyses, or assumptions regarding bounding conditions or representative components. It was unclear if stress analyses were based on component design data or on as found condition. It was unclear if reliance on projections from operational history included more than a simple count of transients; for example, were plating programs, shroud cracking, vessel cladding defects, and so on considered.

In any case, it was clear that it would be difficult to record in the review documents the path, choices, and rationale used by the licensee in developing and implementing its analyses. How, for example, would a reviewer validate the licensee's underlying assumptions? How would one assess the licensee's so-called reasonableness standard?

My comment on this can be summed in my concern for the quality of what will be NRC Staff's recorded response to the licensee's analyses and proposed aging management program for reactor internal components. Will NRC Staff provide enough information to allow for technical review of their conclusions and the bases for their conclusions?

Thank you for your time and attention,

Sincerely,
Raymond Shadis

At 12:03 PM 1/9/2008, you wrote:

Mr. Shadis

The NRC appreciates your participation in the meeting on Tuesday (January 8, 2008).

If you would, please put down the comments you made during the comment period of the meeting in writing and send them to me via email. I would like to make the comments part of the record. The plan is to have all comments made by the public put into an enclosure to the meeting summary.

Thank you!

Mail Envelope Properties (47861B21.566 : 1 : 17766)

Subject: Re: comments in writing
Creation Date 01/10/2008 8:17:20 AM
From: Raymond Shadis <shadis@prexar.com>

Created By: shadis@prexar.com

Recipients

nrc.gov

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JGR (Jonathan Rowley)

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Ulrich CC (Ulrich K. Witte)

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Files	Size	Date & Time
TEXT.htm	3449	
2008-01-10 NRC ROWLEY.doc		26112
Mime.822	40863	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No

Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling

This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User

Junk Mail handling disabled by Administrator

Junk List is not enabled

Junk Mail using personal address books is not enabled

Block List is not enabled

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