EDO Principal Correspondence Control

FROM: DUE: 03/25/11 EDO CONTROL: G20110127
DOC DT: 02/22/11
FINAL REPLY:

Michael Mulligan
Hinsdale, New Hampshire

TO:

Borchardt, EDO

FOR SIGNATURE OF : ** GRN ** CRC NO:

Leeds, NRR

DESC:

2.206 - Palisades (EDATS: OEDO-2011-0156)

ROUTING:

Borchardt
Weber
Virgilio
Ash
Muessle
OGC/GC
Satorius, RIII
Burns, OGC
Mensah, NRR
Scott, OGC
Wittick, OEDO

DATE: 02/23/11

ASSIGNED TO: CONTACT:

NRR Leeds

SPECIAL INSTRUCTIONS OR REMARKS:

Template: EDO-001

E-RIDS: EDO-01

EDATS

Electronic Document and Action Tracking System

EDATS Number: OEDO-2011-0156 **Source:** OEDO

General Information

Assigned To: NRR
OEDO Due Date: 3/25/2011 11:00 PM
Other Assignees:
SECY Due Date: NONE
Subject: 2.206 - Palisades
Description:

CC Routing: RegionIII; OGC
ADAMS Accession Numbers - Incoming: NONE
Response/Package: NONE

Other Information

Cross Reference Number: G20110127
Staff Initiated: NO
Related Task:
Recurring Item: NO
File Routing: EDATS
Agency Lesson Learned: NO
OEDO Monthly Report Item: NO

Process Information

Action Type: 2.206 Review
Priority: Medium
Sensitivity: None
Signature Level: NRR
Urgency: NO
Approval Level: No Approval Required
OEDO Concurrence: NO
OCM Concurrence: NO
OCA Concurrence: NO
Special Instructions:

Document Information

Originator Name: Michael J. Mulligan
Date of Incoming: 2/22/2011
Originating Organization: Citizens
Document Received by OEDO Date: 2/23/2011
Addressee: R. W. Borchardt, EDO
Date Response Requested by Originator: 3/25/2011
Incoming Task Received: 2.206

Jaegers, Cathy

From: Michael J Mulligan [steamshovel2002@comcast.net]
Sent: Tuesday, February 22, 2011 1:47 PM
To: NRC Allegation
Subject: Request Emergency Palisades shutdown

Feb 22, 2011

R. William Borchardt
Executive Director for Operations
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject 2.206: Request a emergency shutdown of Palisades because the Reactor Oversight Program is ineffective and Entergy has a documented history of a culture of falsification and thumbing their noses at reoccurring violations. It should be noted in this inspection period most of the fleet of Entergy's plants are on fire and burning in the Gulf of Mexico with numerous NRC inspection findings including Grand Gulf, River Bend, Arkansas One and Cooper.

> Jan 18, 2011: my 2.206 Emergency shutdown of Vermont Yankee
>
> *"The safety culture of the plant is impaired because of information inaccuracies and wide spread acceptance of falsifications."*
>
> *"I request Vermont Yankee to be immediately be shut down and that Entergy be prohibited from owning nuclear power plants... because Entergy doesn't have the integrity to tell the truth about safety and nuclear power plant issues. Money and profits comes before truth telling and full disclosures."*

Dear Mr. Borchardt,

In the 1942 movie Casablanca:

> Rick Blaine: How can you close me up? On what grounds?
> Captain Louis Renault: I'm shocked, shocked to find that gambling is going on in here.

There just has been unprecedented political pressures to intimidate the NRC to reduce regulations and safety margins at nuclear plant in the last four months. There has been political insinuations made by the mad dog rabid Republicans that they are going to cut the NRC 's budget if the NRC doesn't reduce regulation to the nation's nuclear power plants and relicense old plants' willy nilly. It seems these Republicans' are going after the NRC in order to take down President Obama, or just to get even to the president because of Yucca Mountain. It stated last fall just before the election with the ranking House Republican of Reps. Fred Upton (R-MI) and

Ed Whitfield (R-KY) asking the NRC OIG for an investigation concerning Yucca Mountain and the supposed misdeeds of Chairman Jazcko. Recently, the ranking senators James Inhofe (Oklahoma) and David Vitter (Louisiana) have been filling up the newspapers and the media intimidating the NRC to cut regulations concerning the New England nuclear plants. Just one more politician added to this Republican team and will have the Keating Five Senators who tried to influencing the Savings and Loans debacle back in the Early 1990s. The Democrats are missing from this team as in the Keating Fives...but this is political corruption in order weaken the safety of the nation's nuclear power plants. Collectively this is all unethical and illegal activity in order to improperly influence the NRC.

http://www.reformer.com/opinion/ci_17418804

MYOB on VY (I read it as BYOB)

Posted: 02/18/2011 03:00:00 AM EST
Friday February 18, 2011

We're thinking about tweeting that message to Sen. James Inhofe, R-Okla., the ranking member of the Senate Environment and Public Works Committee, and Sen. David Vitter, R-La.
In case you're not up to snuff on Internet slang, MYOB means "mind you own business."
We don't think we need to explain what VY stands for.
Inhofe and Vitter recently sent a letter to the Nuclear Regulatory Commission accusing it of employing a "dual standard" for taking too long to review the relicensing application for Vermont Yankee nuclear power plant in Vernon.
They said while the NRC has approved applications in communities where residents don't put up too much of a fight, the NRC permits "excessive, unmanaged delays for applications perceived to be more controversial."
(Since 2000, 62 of the nation's 104 reactors have been relicensed with minimal public resistance.)
Wow! Imagine that.
You mean a federal agency should receive approbation because it actually takes into consideration citizen involvement in "controversial" issues?
Inhofe and Vitter are concerned about the relicensing review for Pilgrim in Plymouth, Mass., as well as Vermont Yankee. Both power plants, which are owned by Entergy, are entering their sixth year of review.
The senators also wrote that "the degree of intervention or controversy should not be used as an excuse for delays in decision-making."
We don't think the NRC is using it as "an excuse for delays."
As NRC spokesman Neil Sheehan said, "There have been many twists and turns" in the relicensing process.
Nevertheless, the agency is following its own rules in the relicensing application review for Yankee.
The reason why Yankee's license hasn't yet been renewed is the result of contentions filed by the New England Coalition, which has opposed the plant's operation since it first powered up in 1972.
NEC's concerns center on Entergy's plan to maintain the plant's aging systems, components and pipes. The NRC took the coalition's contentions seriously enough to

recommend that the Atomic Safety and Licensing Board conduct hearings to review coalition filings.

The contentions have been batted back and forth between the ASLB and the NRC's three-member commission, which is the ultimate authority on whether a nuclear power plant should receive a new license.

Last year, the ASLB gave New England Coalition another opportunity to protest Yankee's aging management plan, but the coalition instead submitted a contention related to submerged electrical cables. The ASLB ruled that the new contention did not qualify for consideration because it had nothing to do with metal fatigue, the matter at hand.

NEC appealed the decision to the commission, which is reviewing it.

While NRC's staffers concluded in May 2008 that there were no environmental or safety reasons not to relicense Yankee, the commission is staying mum on if and when it might issue a new license.

"The commission takes its time," said Sheehan. "This is the way the process is supposed to work."

Vitter and Inhofe (and Rep. Fred Upton, R-Mich., chairman of the House Energy and Commerce Committee, who wrote his own letter to the NRC) need to consider that before they go poking their noses into a process that is designed to consider citizen input and to evaluate legitimate concerns submitted by intervenors such as the New England Coalition.

Rather than accusing the NRC of practicing a "dual standard," they should commend Vermonters and residents of the tri-state region for staying involved in a federal review that will affect their lives for the next 20 years, at least.

Maybe it's different where they come from, but New Englanders are not known for sitting back and letting such important issues pass them by.

We here in the tri-state region have a tweet for them: WADR, we CCL about your HO. So DUAF and GBTW in DC. IOW TAH.

(With all due respect, we couldn't care less about your "humble" opinion. So do us a favor and get back to work in Washington. In other words: Take a hike.)

Just last month (this January) within a few weeks of each other Palisades nuclear plant has had large equipment cable shorts, fires and electrical explosions. One caused the plant to go into a emergency down power to half power. The other accident almost two weeks later was worst, it cause a emergency shutdown and other equipment failed. These kinds of accidents increase the safety risk to a nuclear plant and it indicates serious problem at the plant and within the Nuclear Regulatory Commission. It is of no surprise within a week of the most horrendous recent inspection reporting period imaginable ending Dec 31, 2010 Palisades had the explosion with the breaker. These two events are direct indication that the pressure from the NRC and their Reactor Oversight Program is insufficient to turn the heart of corporate Entergy. In the last few years Entergy-Palisades had gotten into serious troubles with the agency and their plant. The NRC has expended enormous resources trying to engage Entergy into being a better corporate citizen. The NRC just doesn't create enough incentives or plain fear for a corporation to come back to their senses. Entergy's behavior and truthfulness is worsening from inspection period to inspection, and so isn't the NRC. I don't care what the NRC says. Here are the two plant transients in January 2011.

UNUSUAL EVENT DECLARED DUE TO CATASTROPHIC FAILURE OF NON-SAFETY RELATED BUS BREAKER

(1/8/2011) A notice of unusual event was declared for 'Hazards and other conditions

affecting plant safety' at 1303 EST for Emergency Action Level (EAL) HU1 as a result of a breaker/bus fault in a non-safety related feeder bus 'F'. The loss of the bus resulted in loss of cooling water tower pumps and fans and subsequently a loss of one cooling tower. There is indication of a pressure transient on the breaker panel and smoke but no fire. There is no indication of sabotage or terrorism, and no offsite assistance requested. There is no radiological release in progress. The NRC remains in the normal mode. NRC Resident staff are enroute to the site. Plant is stable at 55 % reactor power following a down-power maneuver from 100% reactor power with all safety related equipment operable.

AUTOMATIC REACTOR TRIP DUE TO LOSS OF GENERATOR LOAD
(1/22/2011) The licensee reported a loss of main generator load at full power resulting in a generator trip, turbine trip, and reactor trip. All rods fully inserted. All safety systems functioned as required. The reactor is stable at no-load temperature and pressure in Hot Standby. Auxiliary feedwater started as expected and is currently supplying cooling water to the steam generators. Decay heat is being removed via the atmospheric steam dumps because the turbine bypass system did not respond as expected. There is no known primary to secondary generator leakage The grid is stable and the plant is in a normal post-trip electrical lineup. The reactor trip was characterized as uncomplicated.

The below is what the Vermont Governor thinks about Entergy. I live across the Connecticut River in New Hampshire and I live within two miles of the plant. The Vermont's legislator had vetoed the continued operation of the plant over a huge leak of tritium last year. Their new governor got elected over Vermont Yankee VY tritium issues and his aims has always been to shutdown the plant in 2012 after its forty year life.

I came into information before anyone else did that Entergy was sitting on positive samples of tritium in a new well. I lost track in recent weeks how many new wells that have become positive, but I first alerted everyone in my area that Entergy was yet again was giving false testimony to a state authority. I knew they didn't admit in the sworn Public Service Board testimony that additional wells had recently shown up contaminated and the tritium liquid scintillation detector had suspiciously shown up broken for two week delaying the tritium disclosure before the Vermont PSB testimony. I submitted this 2.206 that began this Palisades petition, then mysterious within two days Entergy admitted they another separate leaking something. This cascaded into the disclosure of the broken detection device, then more wells showed up with tritium. There is generally a controversy about the minimum levels of detection of tritium(LLD)...where they first detect unexpected tritium levels and they make believe the LLD is much higher than they know. This delays the investigation of the leak. Vermont says the minimum detectable levels are around 670-700 picocuries per liter of tritium. It was my activities and additional tritium leaks that drove Vermont into creating the Oversight committee.

http://governor.vermont.gov/newsroom-nuclear-oversight

Gov. Peter Shumlin calls for Vermont Yankee Reliability Oversight Committee, citing tritium leaks

MONTPELIER – Gov. Peter Shumlin, citing the on-going discovery of tritium leaks at the plant, instructed the Vermont Department of Public Service to appoint a Vermont Yankee Reliability Oversight Committee.

"I am deeply concerned with Vermont Yankee's lack of transparency about serious problems that continue to be discovered around the plant."

"Then, last Friday, I was told that yet another well had a tritium hit. Vermont Yankee had the samples pulled that showed the new tritium hits, but didn't test those samples for a few weeks because a piece of equipment was broken."

"Gov. Shumlin noted that no investigation occurred during those weeks, while tritium levels rose. Plant officials participated in hearings at the Public Service Board about the leaks the Shumlin administration learned about in January of last year, while the samples showing new tritium hits were sitting untested, unknown to anyone at the state, the Governor said."

Yet another fresh statement from Governor Shumlin's official state web sight complaining about another leak a week from Vermont Yankee. Vermont Yankee is a saint compared to Palisades. How many governor statement you from Michigan's Governor Snyder's web sight? Does he care about the operation of the plant? You would should have a peck of them if he cared about your region.

http://governor.vermont.gov/http%3A/%252Fgovernor.vermont.gov/node/add/media-yankee-statement

"This is the latest in what is becoming a weekly string of problems at the aging plant, and Entergy officials need to move quickly to get to the bottom of not only this leak, but the radioactive tritium leaks that continue to plague the plant, as well."

This is unprecedented that the Vermont state overseers of the plant doesn't trust the integrity of Entergy and the Nuclear Regulatory Commissioners. They are state public service and utilities regulators! This is what the fight over Vermont Yankee is about...it really is not about the technology...it is about trusting the what the words Entergy and the Nuclear Regulatory Commission use and mean to the community around Vermont Yankee. It is the tricky and selective language they all use. It is plain not truthful in its entirety. They know this is hard to understand and a complex technology, then they game the knowledge and rules of the situation knowing we don't get it. They make it sound better than it is...and thus they never have the incentive to change their tune. Here it is from the Vermont Service Boards words:

http://www.bloomberg.com/news/2011-02-10/vt-officials-seek-sworn-statements-from-nuke.html

Vt. officials seek sworn statements from nuke

Feb 10, 2011 11:56 AM ET
By The Associated Press

MONTPELIER, Vt. (AP) — The Vermont Public Service Board has told the owner of the Vermont Yankee nuclear plant it wants reports every two weeks on progress the plant is making in investigating and cleaning up leaks of radioactive substances into soil and water around the Vernon reactor.

And in a highly unusual move, the board is demanding that the reports come in the form of sworn affidavits from officials with the company that owns the plant, a subsidiary of New Orleans-based Entergy Corp.

We think basically in the run up to economic bubble and rising electricity prices of the mid 2000's Entergy didn't think carefully enough about the down side risk of the economy tanking. It was in this bubble mania that Entergy purchased these plants. I just think they don't have enough money and good people to keep up with a host of dilapidated nuclear power plant in this unexpected economic environment. I have issues if they can borrow enough money to keep these plants in good working order.

Your Palisades nuclear plant has had a host of serious problems in the last five years. Basically Entergy falsified the degrading conditions of the boron in the fuel pool racks. Then the issues with the falsification with nuclear manager security issues. A few years back, the locked employees in the containment with broken hatch door with non existent or improper procedures. The repetitive issues with the CRDM leaks has added quite a few extra riskfull shutdowns for the plant. Every unnecessary shutdown and complicated overhaul of the CRDM seals carries an enormous risk of employees injuring themselves, they make extra unnecessary mistakes...this cause them to violate procedures, find issues without having procedure, causes a host of unnecessary NRC findings and violations.

The CRDM and other repetitive problems drive organization into cycles of dysfunction and disorder. As another example, the CRDM seal leak drove the plant into locking employees in the containment without communications...the death of employees was possibility in that environment of heat. One of the new VT-2 procedure violations comes directly again from another CRDM leak driving a employee into making a personal mistake. I just think with these extra failures and degradations you are running up to the limits of what the organization can understand and deal with. The equipment breaks unexpectedly because not enough money is spent. It puts an extra load (dysfunction, NRC findings, violations, public involvement, electrical shorts, explosions, plant down powering and shutdowns), on the fragile organization, then the constraints and disorder of the bureaucracy that been the hall mark of Entergy for years creates another round of plant problems, equipment failures, personal errors, the resultant necessary falsifications to protect oneself and profit...it become a terrible circle that is hard to recover form. It a terrible distructive cycle on the organization, and its repeated over and over again for years...and the NRC activities just can't break this pattern. You got the fuel pin failure problems, security managers lying to the NRC, the QA/ CA stuff with a host of safety inspections missing corporate wide, more falsification on a grand scale, falsified security information given to the NRC, QA/QC managers' professional credentials falsified, stuck fuel assemblies in the fuel pool rack caused by degrading boron below safety limits that they (Palisades and the NRC) knew about for decades, and did nothing...a enormous amount of NRC resources have been expended on the Palisades plant over the last five years and nothing ever changes based on this inspection report. There is a consequence to it all.

We worry Palisades will steal NRC resources from finding problems at another plant. These guys have been on extraordinary NRC intensive care and their body are hooked up to every imaginable IV tube and machine in the intensive care room. I afraid these guys are eating up NRC oversight reserves and they going to miss a emergent problem at a plant somewhere else. These guys have gotten so much NRC attention in the last five years compared to a lot of other plants, and this inspection report shows Entergy is a bad as they ever were. I think Entergy just

thumbs their nose at the NRC as business model, they rope-a-dope the agency with issue trying to exhausted the inspectors and NRC. They think it is a waste of time getting straight a A's from the industry and the NRC...they are just skating along making more money by getting D's. It seems they'd rather keep the agency busy on games with old problems so they wouldn't find new dangerous problems. We generally see Entergy sabotaging and crippling their internal oversight organizations on purpose as a business model. This seemingly makes the front line troops more efficient and cost effective in the short term by not having to follow the codes and procedures.

There is another concern, in that that it is cheaper for the Entergy to make the NRC provide contract engineering and safety services than with Entergy doing it with their own staff. Basically all these findings are contract engineering services provide by skills and education of the NRC staff. It cheaper for Entergy to hire the NRC to find their problems than for Entergy to find them on their own. Entergy can save money and boost profits by letting the NRC do their jobs for them.

Temporal: I wish we had a magic button that we could push. We then would know by push the button or the click of a mouse the immediate risk, effectiveness and reliability conditions of the plant or the parent company...hell, the NRC. Maybe predict the future or give us the dog track odds of a component failing. We'd get a green, yellow or red light indicating the threat level of the plant....the chance of a electrical cable short tripping or down powering a plant twice in a row next month. We would have such a powerful computer that it knows everything about the plant and the organizations...the NRC. It would know the conditions (dysfunction) of the managers and employees, we would know every error of a policy, the absence of a procedure, rule or organization attribute, know perfectly every defect in every component. We would have the perfect god's eye view of the plant and the organization. Push the magic button, do we have a green, yellow or red light at Palisades, the NRC or Entergy.

All these past problems are effectively working their way through the beast now, all within their discovery and correcting phase. These things are never black and white at these nuclear plants. We got the continued problems like they discovered last inspection and the ones that are going to occur next inspection. This is a big problem with the NRC....they don't really actually know where we exactly stand. We got all these past but not fully corrected problems, the falsification and inaccuracy. We are not sure in what state of discovery and correction phase they are in, the ones we just discovered, the one identified but repeated ones over and over again. How then the multitudes of serious ones we have not yet discovered, but they are simmering active below the surface unseen. We really don't understand where these problems are in the temporal dimension on the big picture (chronologic, sequential, threat, in stages of completion, there is such a long latency period between emergence of the error and its fix), we know these errors and defects are all spinning around in the organization and in the ether, but we have no framework to understand what is the totality risk or threat to plant reliability right now. We have no quick, we have no visually representation of what happened, what is broken or degraded, what is going on right now, what is going on in the future...like a Thinkmap Visual Thesaurus. We are basically plowing along in a car in Midtown Manhattan without ever been there before and driving by feel.

Do you see what I am getting at, we understand the chronological sequence with what we see from the inspection reports, like the timeframe of the sticking containment hatch and the trapped personal. But spinning along in the same timeframe was the yet undisclosed and then half corrected fuel pool boron problem, QA/QC problem, the crane, and so on. If we seen these

events perfectly and going on at the same time, seen where exactly everything begun and became fixed, not within the illusionary temporal framework the NRC projects to us, their discoveries and disclosures in the inspection reports...would we use a lot more effort to make Entergy come their senses sooner if we knew their true condition. Would Entergy serve us and their stockholders better if they knew exactly where they stood and did the correction early without excuses. It is a grand philosophical question...I think Entergy would make more profits by knowing exactly where they stood, not this wasteful chaos we see now...not this thing set by budget number disconnected from the facts. Do you think if we seen ourselves exactly for as we are, seen ourselves as other people see us...do you think we would be better people? It our self illusion that are killing us.

We can use the past as a prologue to the future. Palisades has a documented history of past serious problems, I think the NRC is overwhelmed so we are only seeing a small percentage of the problems at the Palisade plant. We know from the study of the past that there are huge problems spinning unseen right now at Palisades that the NRC doesn't document. It is going to boggle the mine with what the NRC discovers in the next year or two at Palisades, just like the last two year. I say they are going to find bigger and more repetitive problems. This can't be the most economically efficient way to operative a nuclear power plant. All these errors and defects our spinning around uncontrollable in some state of completeness and incompleteness...and we have no conception of the structure of the error and the true state of the organization. Then you got the increasing cost of energy hitting us now, the deflated energy market or our economy, nuclear maintenance cost going up and profits going down, you got increasing poor people for as far as the eyes can. Don't you wish you can see and understand the structure of how everything interacts in time? When Entergy went on a plant buying spree during the euphoric early and mid part of sky rocketing stock market of the 1990's, I don't think they could imagine taking care of all these troubled nuclear plants in our economic depression. I am sure they think it was the worst mistake Entergy ever made. We don't know much deeper Entergy is going to be sucked into this troubled nuclear plant black hole...we they be able to borrow if their ratings tanks?

It is not the technology that is failing us, it our management of energy and the management in particular Entergy and NRC. Its corporate management in general. Believe me, I understand that it is corporate and a centralized force or cohesion that keeps the world glued together. We would still be in the stone age if we didn't have these powerful hierarchal organizations. Something internally is blinding theses organization and they are stumbling around like a blind man. There is a spirit that becomes missing in the way the do corporatism today. I am no communist or pure socialist believe me. Its seems its the political management of our legislators and presidents. It is not any one president...it is a string of presidents doing exactly the same thing...nothing. Damn it, it our fault, it is every ones fault, cause most of don't want to step and help our nation do the right. We supposedly do the right thing through the lens of our ideologies...but over and over again it is a train wreck. Ideologies as we use them today define self interest. It is us that is doing this to us. We are all out for ourselves?

Don't you wish you have the button on your computer where it would give you a yellow, red or green light? How are we doing right now? How will the whole of Entergy do in a year, two or five years...where will the NRC be stationed in the next decade? What we have seen from the shores of the Connecticut River is how totally unpredictable the behavior of the Vermont Yankee, Entergy and the NRC has been in the last few years. They made unbelievably atrocious events legal...they kept the plant running when they should have shut down and fix the AOG piping. Entergy and the Nuclear Regulator Commission talk to us in this mindless corporate legalese

where they twist all of the world around to their ends. Nothing of this is in our nation's long term interest...making the world better for us. We continued to be astonished with what we don't know about the plant...what they are doing the behind the secrecy of the security fence. History teaches us unimaginable things are going on behind the security fence of Palisades, and the NRC misses the really important stuff. Better, the NRC doesn't have the power to make Entergy meet the greater ends of us all...

Excerpts from Palisades Inspection report from July 1, 2010 to Sept 30 2010: 05000255/2010004.

What you are going to see through these two recent inspection report...the most recent and the second most recent... is the reeking hand holding the NRC is doing to Entergy. In many aspects Entergy is not a self directed or self governed organization. Where would Entergy be without the NRC? What is going when the NRC is not watching them? The NRC discovered foreign material in this safety related motor vents and they are removing the motor to repair it...that is why they removed the floor plug... and there is no inspection findings on Entergy not discovering the degraded safety motor? It going to be sickening for the rest of my discussion hearing about all the procedure problems with Entergy. It is a national problem at almost every nuclear plant and especially the troubled plants and corporations. It is going on throughout the Entergy organization. They had a ceremonial employee stationed in the room because it is safety related and he had no idea what he was to do if their was a accident? This is a form of falsification because they are supposed to have the detailed knowledge to know what to do in a nuclear plant. The whole thing with the person standing watch at the floor plug...but functionally it was a falsification because nobody have any backup information if things went south.

> *Floor Plug*: On June 14, 2010, the licensee began replacement of the 8A AFW pump motor to ensure operability of the AFW pump. Earlier in the day, the inspectors identified foreign material in the motor vents that came from the rotor. In order to replace the motor, the licensee removed the floor plug. In addition to the 8A motor driven AFW, the room also contains the 8B turbine driven AFW pump. In addition, the inspectors concluded that although the licensee stationed a worker to re-install the floor plug, the lack of knowledge regarding resources needed to reinstall the plug negated the risk mitigation benefit of stationing the worker. "The failure to properly assess and manage the risk associated with the removal of the AFW pump room floor plug"...had a ceremonial employee stationed at the floor plug and constant communication with the control room but neither the control room or the employee had the materials or knowledge to be able to install the plug in a emergency. "Earlier in the day, the inspectors identified foreign material in the motor vents that came from the rotor.""The failure to properly assess and manage the risk associated with the removal of the AFW pump room floor plug "A contributing cause of the finding was associated with the human performance cross-cutting component of resources, in that the licensee failed to provide complete, accurate, and up-to-date procedures that are adequate to ensure nuclear safety (H.2(c))."

A falsification again with giving "Inaccurate and Incomplete Information or Failure to Make a Required Report with this battery charger. You notice how obsolete the gear is with it not being fully instrumented up and all the indication not being immediately available in the control room. You going to see this over and over again when a device fails and threaten a shutdown Entergy goes intelligently stupid. A lot of short term profits can be made by faking stupidity...it steals long term security from the whole of all of us. They automatically declare, to maintain capacity factor numbers without technical foundation, it is not safety related. A lot of time they

write these tech specs to be unclear...so this gives them the fertile opportunity to play the stupid game. You going to see nuclear venders gaming engineering evaluations in support of the licensees...in search of destructive short term profit and inflating stock prices. They purposely misinterpret tech specs as a business plan and they train their employee in how to do this. They teach their mangers to play the technical gaming language game. This is all a game and its disconnected from ethics and morality. It makes you wonder on a national level with how much the corruptions and falsification goes into the high capacity factors...how gaming language for corporate profits breaks the spirit of these good employees with the lies over capacity factor nationwide? I think the biggest risk is not from the threat of a bad accident from the direct engineering falsification of the component, but the threat comes from killing the spirit of their employees. The employees know these large corporations have overwhelming power to do whatever they wish...could consume a hard won career on a whim. Can you imagine what it is like to be a good employee where it is part of your job to intentional misinterpret tech spec? How many good employee going home feeling bad over this? How many times are we going to hear it failed because of equipment aging that was neglected for decades. It drove the licensed operators into lying about the safety relatedness and misinterpreting tech spec in order to maintain capacity factor...survival and profits first philosophy. You see how plant aging and improper maintenance drives the licenses employees into lying and corruption, how this mixture is a poison to the hearts of these people. The NRC actively accommodates this corrupt activity because they think congress demands it. By the way, the licenses and the NRC would say the UFSAR is our bible and Constitution. We knew the UFSAR was so simple minded and lacking of any real information, we called them our comic books. The technical people would go to the UFSARS and it would be lack of any engineering guidance to make the nuclear do the right thing in a tough situation. Most UFSAR are dangerous and incomplete...it is nothing but a political document coming directly from congress.

We worry if the NRC is participating in some kind of malicious, malignant or narcissistic compliance issues over regulations with congress, a narcissistic technical ideaology that is destroying the industry. Basically self interested ideaology and technical propaganda overrides the facts. The ideaology is designed for capacity factor above safety and comment sense. It is a legacy of the 1970's and regulator in bed with the utilities.

You going to think this is a comic book as you read along, we are only talking about a short period of time, with the times the regulators scratched their heads over the written gibberish in the plant bible the UFSAR.

> *Loss of Load Reactor Trip Function*: On August 23, charger ED-206 failed resulting in loss of power to the 125 Vdc data logger panel. The design of the system does not include control room annunciation on loss of the charger The effect of this condition was that the Loss of Load reactor trip would not function.
>
> LER 10-02-00: "Entry into TS LCO 3.0.3 was also determined to not be required because, as discussed in the TS LCO 3.3.1 Bases, the loss of load trip is not relied on in the safety analyses to trip the reactor upon a loss of load, and is intended only for equipment protection. As described in the TS Bases, Section B3.3.1, the purpose of the loss of load reactor trip is to prevent lifting the pressurizer safety valves and main steam safety valves in the event of a turbine generator trip during power operations. In the Loss of External Load safety analysis in Section 14.12 of the Final Safety Analysis Report, the high pressurizer pressure trip is credited with tripping the reactor. The loss of load trip is

intended only for equipment protection and is not required for reactor protection. An apparent cause evaluation of the failure of battery charger ED-206 determined that the charger failed due to component aging because there were no regularly scheduled maintenance activities for the
charger.

"Entry into TS LCO 3.0.3 due to the inoperable loss of load reactor trip function would have required that plant power be reduced to less than 17 percent in accordance with TS Table 3.3.1-1." In addition, LCO 3.0.3 requires that when an LCO is not met and the associated actions are not provided that action shall be initiated within 1 hour to place the plant in Mode 3 within 7 hours (inspection report).

On August 23, the licensee lost the trip function associated with the loss of turbine load but did not recognize that this condition was a loss of a safety function and reportable within 8 hours as required by10 CFR 50.72 The inspectors reviewed...."reporting failure" is included as an example of a violation that impacted the regulatory process and subject to traditional enforcement. The inspectors reviewed the finding in accordance with the enforcement policy Section 6.9, "Inaccurate and Incomplete Information or Failure to Make a Required Report," and concluded that the finding was Severity Level IV because it matches example 9: "A licensee fails to make a report required by 10 CFR 50.72 or 10 CFR 50.73," and there was no associated violation of Severity Level III or greater. (inspection report).

You get it, the spinning component, engineering and organizational problems in the ether of history past and future. The reoccurring capacity factor issue with the unreliable leaking CRDM seals and many plant shutdowns over them. The Leaking CRDM seals drove Palisades into locking employees in the containment trying steam cook them like vegetables and fish with the seals in 2008. Last inspection report it drove the employees into having procedure issue with visual exam requirement...or at least letting the NRC discover the problem. In this day and age with critical equipment illumination and visual acuity inspections requirements, how come they don't have electronic device to measure illumination and record distance? Dad, what are the movies and pictures? They are going to have issues with VT-2 in the next inspection report. One day the NRC dings them on ASME codes and procedures issues, the next day they flub the VT-2 inspection requirements because they weren't following and aware of the Palisades VT-2 procedure issues. This isn't about codes and procedures...they are inspecting a critical safety component of the reactor vessel.

In a very short period of time over two inspection reports we are going to see reoccurring issues and over again. One wonders on a decade level look how many problems reoccur over and over again. It is absolutely mind boggling on a nation level how these plants don't learn from each other...the reoccurring problems on a national level.

VT-2 Visual Examination: A finding of very low safety significance (Green) and associated NCV of Technical Specification 5.4.1, Procedures, was identified by the inspectors for the failure to ensure that ASME Code and site procedural requirements were understood and incorporated during the performance of VT-2 inservice inspections. Specifically, the illumination requirements specified in the Code had not been properly incorporated into site examination procedures and work instructions. During a forced outage in June 2010 to correct excessive control rod drive mechanism (CRDM) seal leakage, the licensee

replaced the seal package for one of the CRDMs. Part of the post-maintenance testing included a VT-2 visual examination of the affected CRDM components at normal operating temperature and pressure. A contributing cause of the finding was associated with the human performance area, cross-cutting component of resources, with the aspect that the licensee failed to have adequate procedures for the conduct of VT-2 exams. Specifically, the licensee did not ensure that Code requirements were incorporated into work instructions in a manner that allowed all personnel performing exams to be familiar with the illumination and documentation requirements of the Code (H.2(c)).

"There you go again", as President Reagan said , the procedures didn't contain sufficient detail. This just might get to the crux of the nation wide nuclear industry problem with procedures. The employee are overly dependant on procedures, procedure are suppose to be like a guide, they are suppose to have a adequate level of craft of the skills or trade, training and experience level...it is extraordinarily dangerous flying exclusively by the seat of pants of a procedure. Procedure, procedure, problems everywhere you look? I'd like to know how long Entergy lived with ground on the safety related bus? You got to know with all these problems with the NRC's hand holding of Palisades...the plants Corrective Action Program and problem identification program, the body of Entergy is brain dead and not breathing. The CAP is a safety related program and it is not addressed. The CAP is like our immune system, Palisades got the "nothing ever matters HIV diseases". The still have corrective action program problema on the fuel pool racks boron issues, they climb a ladder of failures with past corrective action program problems ...the CAP is found to be dead over and over again and its never addressed. Their Corrective Action Program nuclear plant immune system is in a "unaware" meltdown low functional level.

Ground on safety-related inverter ED-07: The inspectors identified a finding of very low safety significance (Green) and associated NCV of 10 CFR 50 Appendix B, Criterion V, for the failure to accomplish activities affecting quality as prescribed by the documented instructions, procedures, or drawings.

The licensee initially attributed the bare wire to a manufacturing error and documented this conclusion in the
CAP. When the inspectors questioned electrical maintenance supervision on the installation of these components, they discovered that personnel involved in the **CAP evaluation** and closure were **unaware** that the solenoid may have been partially disassembled by site electrical workers as part of the installation process. When the inspectors questioned electrical maintenance supervision on the installation of these components, they discovered that personnel involved in the CAP evaluation and closure were unaware that the solenoid may have been partially disassembled by site electrical workers as part of the installation process. Specifically, the licensee concluded that the procedure used contained sufficient detail and that tightening of the bushing was skill expected of electricians.

Specifically, the ground reduced the reliability of the associated safety-related electrical bus and correction of the ground required rendering the control Room HVAC chiller inoperable.

The question is, not if it is over or under measuring employee radiation dose...the horror is Entergy and the NRC didn't assure the known operation of the Dosimeter was with a mixture of radiation. The capability of the device was not bullet proof accurate..for hundreds of employees.

These are all very troubling indications for this mature of a industry. It is absolutely chilling they didn't know this before the personal safety device was hung on the employees clothing.

> *Dosimeters*: The licensee uses a vendor to supply and process dosimeters used to measure radiation exposure for the monitored workers. This vendor is NVLAP accredited for beta, gamma, neutron, mixture of beta/gamma, and mixture neutron/gamma radiations. The inspectors determined that this mixture of three radiation types may not be aligned with the accreditation process. The licensee indicated that the dosimeter processor makes some assumptions of the types of radiation that the worker was exposed to and selects an appropriate algorithm for processing the dosimeter. Use of TLDs May Not Be Consistent With the Methods Used by the NVLAP Accreditation Process).

A complete falsification in they failed to make a report and then they lied in a NOED request. There was a threat to plant operation and capacity factor...Entergy will lie through their teeth to stay up at power to make profits. They must got employee training on how to lie to the NRC, to develop a professional skills base for this complicated of a activity. To stay up at power they lied to the agency saying the hardness is tested on every sample. Have we talked about stupid intelligence. Entergy is was suppose to have to have absolute evidence that it is tested as stated for temporary permission to reduce code and standards so a plant does not have to into a shutdown in power. Can a vender supplier give a licensee the latitude to be slippery on a NOED, then without punishment admit the requirements weren't met? The old wink, wink. This is atrocious behavior by the NRC because they are telegraphing to the licensees, before we force you to shut down because of inadequate assurance for safety, you are suppose to lie to us. You are allowed to lie to us without fear of penalty. You can admit to your lie months later after the operational threat and you will be forgiven from any falsification. Remember, if you fail to lie to us we will be force to place you in safe condition and shut you down. Falsification is a state of business in the nuclear industry and you better learn how to do it good!

> *Service water pump coupling failure*: (Closed) Licensee Event Report 2010-001-00, Potential Loss of Safety Function Due to a Service Water Pump Shaft Coupling Failure On September 29, 2009, one of the shaft couplings on the P-7C service water pump failed, rendering the pump inoperable. The inspectors reviewed the LER and determined that the 60-day reporting requirement of 10 CFR 50.73 was not met. Specifically, shortly after the event the licensee had reasonable information as described in NUREG-1022, "Event Reporting Guidelines for 10 CFR 50.72 and 50.73," that there was likely a loss of safety function based on the particular failure mechanism.
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> *LER 2010-001*: Subsequent metallurgical analysis determined that the coupling failed due to intergranular stress corrosion cracking (IGSCC) that was caused by the coupling being too hard. The couplings for P-7C are 416 stainless steel (SS) with a required hardness between 28-32 Rockwell C (Rc). The inspectors reviewed the LER and determined that the 60-day reporting requirement of 10 CFR 50.73 was not met. Specifically, shortly after the event the licensee had reasonable information as described in NUREG-1022, "Event Reporting Guidelines for 10 CFR 50.72 and 50.73," that there was likely a loss of safety function based on the particular failure mechanism. However, the licensee did not start the 'clock' for reportability until January 19, 2010. The licensee submitted the LER on March 19, 2010.

A review of the Certified Material Test Reports (CMTR) from the supplier, HydroAire Services Inc., identified that the final hardness of all eight couplings delivered with P-7C was within specification. However, after the failure, the hardness of the failed coupling was tested by an independent metallurgy lab and found to be approximately 37 Rc throughout the material. A sample of both halves of the failed coupling was also provided to HydroAire for analysis. HydroAire testing results concurred with the independent metallurgy lab results obtained by Palisades, i.e., the hardness of the coupling was approximately 37 Rc.

HydroAire Services Inc. has a quality assurance (QA) program that is compliant with the requirements of 10 CFR 50, Appendix B. Analysis of their manufacturing process and the documentation created during the manufacture of the couplings that were installed in P-7C in June 2009, showed that HydroAire test results indicated that all couplings were within the 28-32 Rc hardness range specified for the couplings. Due to the discrepancy between the post failure hardness testing and the recorded hardness values on the CMTR, it has been determined that HydroAire Service Inc. did not properly control the in-process couplings during the testing process. This resulted in one coupling being out-of-specification that was not detected by the HydroAire Services Inc. QA process. This coupling was installed in P-7C at Palisades, and subsequently faile

So the NRC thinks its time to reference the plant's comic books. It is shocking, shocking there is some kind of discontinuity in the UFSAR. What movie did that term come from? Wasn't Casablanca a unbelievable great movie...

Review of Liquid Rad-waste Incident Description: The inspectors identified an Unresolved Item regarding the licensee's description of liquid waste incidents in the UFSAR. Specifically, Section 14.20 of the UFSAR does not accurately describe tank T-91 and does not discuss how T-91 meets the license of the facility. Discussion: During review of radioactive effluents, the inspectors indentified an unresolved item regarding the description of the liquid waste incident in UFSAR Section 14.20. The UFSAR states that a radioactive liquid leak or spill will be retained within the facility or within 10 CFR 20 limits. Liquid storage tank T-91 often contains tritiated liquid with concentrations greater than the Part 20 effluent limit of .001 uCi/ml. Therefore, the Chapter 14 accident analysis does not accurately reflect the operation of the tank. The inspectors reviewed NUREG-0800, rev. 2 for guidance on acceptable accident analysis for radioactive liquid accidents. NUREG-0800 establishes acceptance criteria to limit releases during tank failures to Part 20 limits at the nearest potable water well or unrestricted area. NUREG-0800 also accepts the use of special systems to meet these limits. Since the design and construction of Palisades pre-dates NUREG-0800, this criteria may not apply. However, 10 CFR 50.71 establishes criteria for maintaining the **UFSAR up to date**. Therefore, the inspectors concluded that the UFSAR should describe how tank T-91 meets the facility license. Since the basis for the acceptability of tank T-91 is not clear, the inspectors could not determine whether the licensee meets regulatory requirements nor can the inspectors assess the significance of an associated performance deficiency. There is no current safety concern because the tank activity would be significantly diluted. In addition, if elevated activity was detected, mitigative action could be taken to reduce ingested quantities to meet the requirements of 10 CFR 20. Therefore, until the license requirements can be determined,

Not using procedures and crappy procedures all over the place...nobody in Entergy is afraid to ever not use a procedure and tolerating a scrappy procedure. Everybody is doing it. Did you every hear the expression: FASTER, CHEAPER, BETTER? It is the old NASA philosophy, you just rip the oversight people away from the shuttle and the system wings along into posterity and rockets launching on time. Entergy has the pattern of internally sabotaging and disabling their safety and oversight authorities in order to boost capacity factor and profits. It is part of their business ideological plan to thumb their nose at standards in order to push capacity factor and stock price.

> *Diesel Generator*: 10 CFR 50, Appendix B, requires that activities affecting quality shall be performed in accordance with procedures. Contrary to this required, on or before June 21, 2010, the licensee positioned the voltage check relay for the 1-2 diesel generator without use of a procedure. This rendered the 1-2 diesel inoperable. Technical Specification 3.8.1 requires, in part, that two qualified diesels be operable.

You know, the state of the craft and experience of the plant staff...why didn't they have the skills in order to prevent this?

> *Fire Diesel*: License Condition 2.C(3) requires, in part, that the licensee shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility. The objectives of Fire Protection Program procedure, EN-DC-330, include ensuring that fire protection features credited in the Fire Protection Program analyses are inspected, tested, and maintained such that they will perform their design functions. Contrary to these requirements, on December 17, 2009, maintenance was performed on the P-9B diesel fire pump which caused the pump to fail during testing approximately 6 months later. Specifically, as part of the effort to correct an issue with the fuel pump gearbox, the routing of the flexible shaft from the gearbox to the overspeed switch was altered such that it created stresses which resulted in premature failure during testing.

Excerpt from Palisades Inspection Report from October 1, 2010, to December 31, 2010: 05000255/2010005.

Where is the acting VP, Operation?

> Mr. Tom Kirwin Vice-President, Operations (Acting)

Oh, baby baby baby baby lie to me one more...it is more than hand holding now. So telegraphs the NRC to the licensee. So Entergy gets a NRC approval for FASTER, CHEAPER, BETTER means to monitor the chemical and volume welds. We will just put a marker on the piping drawling instead of the pipes itself. It is got to be way cheaper. We don't know if this was a capacity factor issue. In 2007 Entergy got a exemption from ASME codes from marking each weld locally...all they had to do it mark it on a isometric drawing. Can you just imagine the pain in the neck it is with looking at the weld and then the drawling, that misspelling is intentional. No procedure and incomplete procedure were available again, this was a object falsification of inspections and documents, and it intent was to do it for the rest of the life of the plant, but do you get it? So you ask the NRC for a cheap exemption, then you lose data for the isometric drawling and any idiot in a cover up to prevent doing future expensive and timely safety

inspections knows you can't have procedures for a cover up to work to prevent future inspections. Really, do you take us for idiots. So you ask for a exemption, lose all the information, then you never have to do another expensive inspection on these welds again. It you get caught trying to falsifying to save money, there is nothing to fear from the NRC.

> *11 Welds in a regulatory black hole*: On October 18, 2010, the inspectors identified that ten chemical and volume control system welds and one containment spray system weld installed in 2009 had not been recorded on Inservice Inspection isometric drawings nor entered into the Inservice Inspection database used to schedule weld examinations. The ASME Code Section XI, Article IWA-2610 required a reference system for all welds and areas subject to a surface or volumetric examination. This reference system included permanent identification and location of each weld and weld centerline. The licensee had requested the NRC approve an alternative to this ASME Code Section XI requirement, and on April 30, 2007, the NRC approved this alternative. In lieu of marking each weld, the licensee committed to identify and locate each weld on an isometric drawing. The purpose of this requirement was to establish a system to locate welds for follow up Section XI required surface or volumetric examinations. The inspectors requested a copy of the site procedures to implement this NRC approved alternative and FASTER, CHEAPER, BETTER? existed to direct site staff to record new welds on the Inservice Inspection isometric drawings. This request prompted the licensee to identify 11 piping welds and a pipe support located in an ASME Section XI Code Class 2 cross-tie line between the chemical and volume control system and the containment spray system, which had not been recorded on Inservice Inspection isometric drawings. The inspectors were concerned that failure to examine a sample of these welds could lead to failure to detect service induced cracks. The finding was determined to be more than minor because the finding, if left uncorrected, would become a more significant safety concern. Absent NRC identification, the licensee would not have examined a sample of these welds, which could have allowed service induced cracks to go undetected. This finding has a cross-cutting aspect in the area of Human Performance, Resources, because the licensee did not provide complete, accurate, and up-to-date procedures, or work packages for the correct labeling of components (IMC 0310, Item H.2(c)). Specifically, the licensee staff failed to establish a weld reference system because up-to-date procedures were not developed to ensure identification and labeling of new welds installed in safety-related systems.

You see the sickening nature of the repeated violations without fear. Same violation from inspection report to inspection report. I just want to know why one day it's a failure follow ASME and tech specs procedure requirements, then next day it is failure to follow their own procedures. Now, does the NRC think the outsiders are idiots. They (NRC and Entergy) must be drinking at the bar riotously laughing at each other, if the outsiders become aware of what we do together old bud we'd be in a world of hurt.

> *(Inspection Report 2010004 last period)* Findings (1) Introduction: A finding of very low safety significance (Green) and associated NCV of Technical Specification 5.4.1, Procedures, was identified by the inspectors for the failure to ensure that ASME Code and site procedural requirements were understood and incorporated during the performance of VT-2 inservice inspections.

> *(Inspection Report 2010005 newest)* Findings (1) Introduction: A finding of very low safety significance (Green) and associated NCV of 10 CFR Part 50 Appendix B, Criterion V,

"Instructions, Procedures and Drawings," was identified by the inspectors for the licensee's failure to follow Procedure CEP-NDE-0955, "Visual Examination of Bare-Metal Surfaces," and perform a bare metal visual examination of vessel head penetration nozzles Nos. 1 and 3 within 4 feet.

This is Beaver Valley's newest inspection report. How come we see no photographic talk from the Palisades NRC inspectors on reactor head inspections? Can't you hear Palisades telling their inspectors, we don't do photographs. You idiots don't have rule to make us take pictures If you aren't here in person to watch us 'not' following procedures on visual inspection for the integrity of the vessel head(Davis Besse) twice in a row, then we are not going to record it for you so you will irritate us with another worthless non sighted violation. What bar do we meet at tonight old buds to laugh at the position they placed us in.

The inspectors reviewed Beaver Valley's boric acid corrosion control program, discussed the program with the program owner, and sampled photographic inspection records of boric acid found on safety significant piping and components inside the Beaver Valley Unit 1 containment during walkdowns conducted by licensee personnel which was directly observed by the resident inspectors on their initial containment entry walkdowns during 1R20 refueling outage conducted on October 2. The inspectors observed the identification and documentation of various boric acid leaks with emphasis on areas that could cause degradation of safety significant components.

Why no electric device that measure visual acuity and illumination levels? You see the huge hole in this setup, they got four or five varying thickness black lines in a gray visual acuity card. The vessel inspector chooses the thinnest line possible as proof he can't see an equivalent crack or defect size....did you see all the falsification here and intentional profit oriented inaccuracies. You might as well perform you pre employment eye chart exam on your own. Do you trust what one person's visual perception is with the gray acuity card with all this not truthfulness...wonder if they have all have documented up to date detailed eye exams? How come no discussion in this inspection report there is a exact sameVT-2 violation in the last inspection...the NRC don't want us to see the connections the magnitude of the repetitive issues. I'll bet the NRC inspector bosses would complain there is too many discussion of repetitive issues such as with the polar crane...the inspection report then won't reflect an accurate statement of Entergy. How there is no talk with the NRC that our oversight activities have absolutely no affect over Entergy and Palisades?

VT-2/ Davis Besse type vessel head nozzle crack inspection: On October 17, 2010, the inspectors identified that the licensee failed to follow Procedure CEP-NDE-0955, "Visual Examination of Bare-Metal Surfaces," to ensure that evidence of PCS leakage could be detected at nozzles Nos. 1 and 3.Specifically, the illumination requirements specified in the Code had not been properly incorporated into site examination procedures and work instructions. During observation of the licensee's bare metal visual examination to detect evidence of head penetration nozzle leakage in accordance with Code Case N-729-1, the inspectors noted that the vessel head area was not well illuminated. For nozzles Nos. 1 and 3 near the center of the head, the license's examiner used a portable light to complete the visual examination from approximately 54 to 60 inches, which exceeded the maximum distance of 4 feet allowed by the Procedure CEP-NDE-0955, "Visual Examination of Bare-Metal Surfaces." Because illumination levels had not been demonstrated as adequate for this distance, the inspectors were concerned that the licensee would not be able to detect

evidence of PCS leakage (e.g., boric acid deposits). The finding was determined to be more than minor because the finding, if left uncorrected, would become a more significant safety concern. The inspectors noted that the licensee's lead examiner had performed the previous head bare metal visual examination and would likely be used for future bare metal visual head examinations. Therefore, absent NRC identification, the licensee would have continued to perform inadequate examinations of the surfaces of the vessel head near nozzles Nos. 1 and 3, which could allow through-wall nozzle cracks to go undetected. Undetected cracks returned to service would place the vessel head at increased risk for leakage and/or nozzle failure, which would affect the safety of an operating reactor.

The head leaking stains kinda reminds me of the confusion with the 11 welds from Black Rock or the Entergy black hole. It they took photographs while they were sober they'd be more organized. This just don't want to create the evidence for the NRC to shoot them in the foot. It is a object attempt with falsification to a federal agency and the mechanism of the cover-up. If an accident happened, both the NRC and Entergy, they don't want to have the recorded evidence of they had forewarning of it. They are gaming our perception with only providing to us with inaccurate and incomplete information reporting on the whole...they intending to create an incomplete mental image for the public and actually themselves. Can imagine the scientific talk of these NRC engineers with "did not appear to impact the base metal to a significant depth"? Does that sound like scientific talk? The words "appear" and "significant depth"...would you want those words riding on a inconceivable economic damage to our nation? They make us use absolute perfectly technically descriptive words to them, then they use words as substantial as the thinness of tissue paper back at us. The Vermont Attorney General is investigating Entergy giving false testimony to the legislators over the meaning of the phrase buried radioactive pipes. How about a little more certainty with the words the agency uses concerning safety.

Davis Besse Head corrosion: On October 17, 2010, the during the licensee's bare metal visual examination to meet Code Case N-729-1, the inspectors observed areas of surface corrosion on the vessel head that were not caused by vessel head penetration nozzle leakage. The licensee believed this corrosion was caused by leakage of water sources above the head which occurred prior to their 2003 baseline head inspection. In CAP 034719, the licensee documented the completion of the 2003 bare metal visual examination of the vessel head and identified boric acid stain between nozzle penetrations Nos. 1 and 3 and scaling (rust) which exists on the reactor head surface and was most significant in the vicinity of nozzle penetration No. 17. The licensee concluded that this surface condition was characteristic of a 30 year old carbon steel component and that no evidence of through-wall nozzle leakage existed. The licensee documented in CAP 034719, that the head was satisfactorily inspected, that stains were removed to allow inspection of underlying metal and that the scaling present, did not appear to impact the base metal to any significant depth. October 10, 2008, was the effective date of the revision to 10 CFR 50.55a(g)(6)(ii)(D), which first required the licensee to implement Code Case N-729-1 that required a visual examination (also known as a bare metal visual) head examination. For these examinations, the licensee did not record any areas of head corrosion (which was present) as "relevant conditions" and the examiners did not record an assessment or review of changes to the head condition (e.g., corrosion) that may have occurred since the 2003 baseline examination. Additionally, the licensee did not record areas of corrosion or other deposits present on the vessel head surface as limitations with respect to completing a visual examination of at least 95 percent of the area defined in Figure 1, "Pressurized Water Reactor Vessel Upper Head Extent of Visual Examination" of Code Case N-729-1.

The licensee interpreted this requirement to mean that corrosion, boric acid deposits, and discoloration were only relevant conditions for the Code Case N-729-1 visual examination if they were caused by boric acid leakage from J-groove welds and nozzles. For boric acid that drips from flanges or other sources above the reactor head, which contacts the head at normal operating temperatures, corrosion induced metal loss could potentially exceed 1 inch per year (reference Boric Acid Corrosion Guidebook, Revision 1 – Electric Power Research Institute (EPRI) Technical Report 1000975). The licensee staff believed that any corrosion induced by boric acid contacting the vessel head from sources above the head would have been properly addressed through their Corrective Action and Boric Acid Corrosion Control Programs. The inspectors agreed with the licensee's conclusion that the scaling and corrosion **did not appear to impact the base metal to a significant depth** and therefore, did not represent a current safety concern (e.g. challenge to structural integrity).

It more sounds like the grunts coming from a high school Wal-Mart unloader drop out?

Accessing risk on the service water system: According to the SRO and Auxiliary Operator, very little discussion took place regarding the main lube oil valves and potential impact, as the SRO thought the system had been filled and vented already (hence there would be no impact). Component cooling water, in turn, was cooling the shutdown cooling flow used to control temperature of the primary coolant (the reactor core).

Wouldn't you want to be on the Palisades refuel floor for the heart thumping loud bang and vibration coming from a dropped reactor head by a crane? How neat would that be for worker with industry bragging rights? I was there for the ten seconds it took for the head to rattle and smash through multiple floors to the basement floor. They could be saying by my age, that was the neatest 10 seconds in my life, besides when I was alone with Linda Lue when I was seventeen. News at 1Ipm? I see Entergy thinks it more efficient to not follow procedures in an outage.

God help us all, can you see the problem with the repetitive nature of Entergy having the instincts to not thedue proper inspections...to do it over and over again like a madman. They are laughing at us and the NRC because these employees and managers know we can't control them. The NRC has no ability to control Palisades...that is my god damned political statement to the NRC. They are constrained by the campaign contribution leaking out of the NRC like the intimidation tritium.

Polar Crane lifting vessel head over reactor: The inspectors identified an NCV of TS 5.4 for the licensee's failure to implement procedures recommended by Regulatory Guide 1.33. Specifically, the licensee failed to implement procedures for maintenance that could affect safety-related equipment in that the licensee did not perform the daily crane check on the main hook for the polar crane until prompted by the inspectors. Description: On October 20, 2010 the inspectors observed the daily tests on the containment polar crane. The licensee intended to move the reactor vessel head from the inspection stand and to the reactor vessel. During the daily checks, the worker performing the check did not test the main hook as part of the checks. The inspector also noted that the worker testing the crane was unfamiliar with the requirements and features of the crane. The worker used the Entergy checklist from EN-MA-119, Material Handling; however, this check list

contained little detail and was not specific to the polar crane. After completion of the test, the inspector inquired when the test of the main hook would be completed. The outage control center and personnel involved with the head lift were unaware that the main hook had not been tested and the licensee proceeded with the head move preparations including connecting the main hook to the head lift rig. After additional inquiries from the inspector, the licensee confirmed that the main hook had not been tested and the licensee removed main hook from the lift rig. The crane operator
then performed testing of the main hook.

Get you wondering about the repeated nature of vessel VT-2 visual inspection and procedure problems. This is being orchestrated directly from congress...the willful blindness of President Obama for not standing up to powerful business interest. The willful numerous issues with the polar cranes around RFO 19 and 20 and most recently. We are as bad as we were just before TMI. The NRC is in shambles and the industry is politically protected. The NRC cycle these dysfunctions though the toothless ROP, the "nothing ever matters" utility Republican ideology.

It is a national disgrace with what we think about government oversight. The NRC is essentially a private regulator and the owners of the regulatory authority are the nuclear utilities and republicans themselves. Most of engineering codes are paid directly by the nuclear utilities to the private code authorities like ASME and ANS. This thing has become a voluntary compliance and code thing...we have absolutely privatized nuclear power plant engineering safety compliance into a corporatism code authority. They have no teeth and no requirements to give the public much information. Collectively the oversight and engineering code standards for nuclear plants are in the hands of private authorities. The nuclear industry pays for them or pays to not have the right codes...it is not that different than the absence of government oversight in the Deep Water Horizon out the Gulf of Mexico. The set up of the NRC as a independent federal regulator places regulation into the hands of rabid mad dog "I hate everything the government" Republican cronies in the House and Senate. The so called independent authority means mostly at the whims of the House and Senate nuclear industry cronies. This makes the NRC the most politicize regulator in the nation. The NRC cringes over the power of the House and Senate industry political cronies....mostly the House. The nuclear industry basically has such a small population footprint, they are such a small proportion of our population....effectively this makes them immune to the will of the ethics and morality of the public. We have housed the nuclear industry increasingly behind a impermeable security and information barrier in support of the republican cronies and the indifferent small d democrats. Increasingly the regulations and laws cage the NRC and plant inspectors...they set free Entergy to do anything thy want.

It is almost like you are entering non USA territory when coming onto nuclear plant property. It is as if the corporate property is exempt from USA regulations and the governmental authority. It is a special corporate non USA territory. It is the only way they can compete with the world markets. The power of Entergy runs supreme on their property or any other nuclear owner. We should be really be more mindful with what goes on behind impermeable barriers.

Most of the corporations in America has made their property non USA territory...this is a widespread trend of national significance. You laugh at my excesses, but 90% of the NRC budgets come directly from utilities and it goes directly into the NRC coffers. I think all the NRC managers think the owners of the NRC are the utility...it is a mental thing. I think all the regulators think they are private authorities and their owners are the businesses and corporations. It is what they have to do to survive and have a good job.

The inspectors noted that the licensee has had numerous issues with the polar crane, including suspended loads in RFO 19 and 20. In addition, the inspectors had previously identified improper daily testing of the L-3 (spent fuel pool crane) in March 2008. Therefore, the inspectors concluded that the licensee has programmatic issues in the proper testing and maintenance of cranes.

- The crane operator was unfamiliar with the daily check requirements;
- the licensee did not ensure testing of the main hook until prompted by the inspectors;
- the polar crane has a history of reliability issues and is considered to be maintenance rule A(1) due to these issues;
- the procedure provided only general details on the daily checks; and
- the prior history of improper conduct of crane daily checks.

The issue impacts the initiating event cornerstone in that a load drop could result in a failure of the primary coolant system boundary. The licensee's operating requirements Generic Letter 85-11 concluded that the potential for load drops is extremely small based, in part, on performance of inspections included in section 5.1.1 of NUREG-0612. Daily crane checks are included in NUREG-0612; therefore, omission or ineffective performance of the daily checks could result in a condition where the potential for a load drop can no longer be considered extremely small. Contrary to this requirement, on October 20, 2010 the licensee failed to verify completion of testing of the main hook on the polar crane. The licensee failed to perform a check of the main hook prior to authorizing the head lift. The procedure used to perform checks lacked details regarding the polar crane features to be tested on a daily basis. Further, the individual who performed the initial daily check was not familiar with the features to be checked. Therefore, the inspectors concluded that the licensee had not implemented the required procedure.

Why can't I have a link on this electronic document that would direct me to all the related inspector reports and paragraphs...instead of hunting furiously to no results with Adams web.

Preconditioning safety equipment: Earlier in 2010, the inspectors identified maintenance activities where the potential for unacceptable preconditioning may not have been adequately evaluated by the licensee. Specifically, TSs surveillances were being credited while they were also being used as post-maintenance tests following diesel generator work. The inspectors evaluated the individual circumstances and determined that unacceptable preconditioning had not occurred.

Are all you people idiots in Michigan? You too hard up for telling truth because of low employment and economic problems. Sounds like Palisades was gaming the inoperability of the liquid scintillation counters and disclosing new radioactive leaks like at Vermont Yankee. So they were shutting down sampling the wells in 2004 as they knew the leak was spreading. If you can't measure it we never know it there. This isn't about health risk of tritium to humans. It is about the health and plant reliability issues related to dishonesty and a culture of falsification. Personally, I think the NRC thinks it is acceptable for a licensee to falsify if it is not safety related according to their definition. "The evaluation was not correct" is a direct falsification and they should be legally responsible for creating good working bureaucracy and accurate evaluations. It is passing strange the NRC is talking about skipped sampled wells through improper analysis many years ago in the recent inspection report.. either they knew there was

contamination going on in 2004 or they were trying to save pennies by not finding harmless tritium...but doesn't it raise the hairs in the back of your head as your contamination levels peak 60,000 picocuries per liter they are talking about it below.

I had to correct a new NRC commissioners testimony during his conformation hearing recently. He said clearly and articulately, there is no tritium levels higher than the EPA drinking water standard of 20,000 picocuries per liter at any plant in the USA. We had at the time 3 million picocuries per liter. You got to watch these guys to keep their facts straight....they are human just like us...they are not gods! I don't care how many PhDs they got.

(IR 2010-02)Palisades didn't want to find tritium in well water: The inspectors identified a finding of very low-safety-significance and an associated NCV of TS requirement 5.5.1, Offsite Dose Calculation Manual (ODCM) for the failure to provide sufficient information to support the change to the ODCM together with the appropriate analyses or evaluations justifying the changes. Examples of the discrepancies included the discontinuation of drinking water (well) samples and a reduction of the frequency for vegetation samples. As a result, the inspectors could not review the appropriate analyses or assess the evaluations justifying the changes. Consequently, the issue was characterized as an URI (05000255/2008-004-01)

- "Well water sampling consisted of monthly samples from the Plant, State Park, and Covert Township Park wells for drinking water. Over the past two years these samples have been eliminated, as the city of South Haven treated water service area has expanded to supply drinking water to all three locations. There are no longer any groundwater samples near the Palisades facility being utilized for drink or irrigation purposes. The Branch Technical Position states that groundwater samples should be taken from one or two sources if likely to affected, samples should be taken when this source is tapped for drinking or irrigation purposes in areas where the hydraulic gradient or recharge properties are suitable for contamination. The plant site, State Park, and Covert Township well samples collections/analysis were based on drinking water. There are no sources of ground water being used for irrigation purposes adjacent to the plant site.

The inspectors determined that this evaluation was not correct. Specifically, this evaluation failed to address community wells that were still used to provide drinking water to homes immediately adjacent to plant property to the south. Contrary to the above, as of March 11, 2010, the licensee did not have sufficient information to support the change to the ODCM together with the appropriate analyses or evaluations justifying the changes. Additionally, the licensee could not demonstrate that the change maintained the level of radioactive effluent control required by 10 CFR Part 50, Appendix I, and did not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

12/10/2007 "Five new ground water monitoring wells were recently installed at Palisades Nuclear Plant in support of the Nuclear Energy institute (NEI) ground water initiative. The initial sampling of one of these wells displayed a level of tritium that triggered the communication protocol of the NEI initiative on ground water protection. On December 10, 2007, at 1830 hours, Entergy confirmed that the tritium concentration for this well was

22,000 picoCuries per liter (pCi/I). The threshold for initiating the communication protocol is 20,000 pCi/I (Offsite Dose Calculation Manual limit for drinking water). This well is located inside the owner controlled area and inside the protected area. This well is not a drinking water source

Remember way back, when I talked about these events spinning around in the ether of history past, current and future? This is a gagging systemic falsification on a unimaginable scale and across many plants. There is so many safety inspections missing and their immune system was dead in the water. They still haven't done the inspection at the plant level...what will they find there? The NRC frames it as a failure to implement experience and qualification requirements. But it is a sickening falsification of QA/QC and manger safety employment credentials. I wonder if the NRC has entered it into the legal system? The trick of the NRC is it cycles through the system for years. This gives them an excuse hide the magnitude of the problem until all the correction are in. So you will partially understand what happened, like maybe the security manager falsification...but it will be years before we know what really happened. The completion of the corrective action could be decades off. I bet you this is a whistleblower issue. I asked before, has Entergy sabotage their safety oversight in ordered to make profits? This poisoned the minds and spirits of so many good employee. These so call QA/QC managers.

Safety related Quality Control and Quality Assurance: An inspection was performed at the Entergy corporate office in Jackson, Mississippi, on June 14 through 17, 2010, to review the circumstances surrounding missed QC verification inspections documented in CR-HQN-2009-01184 and CR-HQN-2010-00013. The issue involved QC verification inspections performed during construction-related activities which were required as part of the Entergy quality oversight and verification programs. This inspection was conducted by inspectors from Regions I, II, and IV, as well as a Senior Program Engineer from the Quality and Vendor Branch of the Office of Nuclear Reactor Regulation (NRR). The inspection covered all NRC-licensed sites owned by Entergy Operations, Inc., including Arkansas Nuclear One, James A. Fitzpatrick, Grand Gulf Nuclear Station, Indian Point Units 2 and 3, Palisades Plant, Pilgrim Nuclear Power Station, River Bend Station, Vermont Yankee, and Waterford 3. The inspectors identified problems with the implementation of elements of the Quality Assurance (QA) Program that affected the fleet of Entergy Operations Inc., (hereafter referred to as "Entergy") nuclear power plants that are licensed by the NRC. While the plant organizations are NRC licensees, Entergy also has corporate groups which are not NRC licensees that are actively involved in some activities affecting sites, including program and procedure changes. Entergy adopted a business strategy of adopting standard programs and procedures at all fleet plants.

On October 30, 2009, the NRC discussed with Entergy the initial concerns about whether QC verification inspections were being performed consistently for the types of work that require that level of inspection. Both the non-licensed and licensed Entergy organizations responded with an appropriate review of the issues. Entergy's review of work documents that were potentially affected was extensive at each site.

There are indication it much more wide spread and the NRC is gaming this by only choosing a few data point.

Falsification of "Quality Assurance" manager safety job qualification....

They falsified the professional credential of how many managers, remember if a QA/QC department were engineered to be incompetent, that means the safety work can be done faster and cheaper without the proper quality of the work. It is just a business objective with Entergy to try and squeak as much work as the can under the proper codes, rules and professional employment qualification as they can. FASTER, CHEAPER, BETTER:...survival only with high capacity, it is just a business ideological tenet. It is lying and falsification to make profits as a acceptable business strategy or model for both Entergy and the NRC! It is lying and falsification in order to gain societal status and rewards...it is not about making our lives better.

> Two findings were identified during this inspection. These findings involved missed QC verification inspections at seven Entergy sites, and the assignment of individuals to the QA Manager position that did not meet the experience and qualification requirements at eight sites.
>
> *Waterford nuclear plant 05000382/2010005 Green*: Inspectors identified a non-cited violation of 10 CFR 50, Appendix B, Criterion II, "Quality Assurance Program," for the failure to implement the experience and qualification requirements of the Quality Assurance Program. As a result, the licensee failed to ensure that two individuals assigned to the position of Quality Assurance Manager met the qualification and experience requirements of ANSI/ANS 3.1-1978 as required by the Quality Assurance Program. Specifically, the individual assigned to be the responsible person for the licensee's overall implementation of the Quality Assurance Program did not have at least 1 year of nuclear plant experience in the overall implementation of the Quality Assurance Program within the quality assurance organization prior to assuming those responsibilities. This issue was entered into the licensee's corrective action program as Condition Report CR-HQN-2010-00386.
>
> During their review of the issues surrounding the improper implementation of quality control (QC) verifications discussed above, the inspectors noted that the root cause analysis documented in CR-HQN-2010-0013 identified that lack of experience of the Quality Assurance (QA) Manager contributed to the failure to identify the trend in missed QC verification inspections.

So standardizing the QC/QA procedures and their structures across Entergy's fleet of nuclear plants was their attempt to sabotage safety quality for profits and long term efficiency? Do you think the punishment...the incentives we all go through in our lives to do right...is enough to change the heart of Entergy.

> The inspectors concluded that the Entergy fleet organizational structure and Entergy strategy of adopting standardized procedures across the fleet were contributing factors to the findings. Specifically:
>
> - Changes to adopt the standard fleet QA program created a partial conflict with existing requirements for worker qualifications at some sites. The process for creating and revising standardized fleet procedures and programs used to meet NRC requirements must ensure that site-specific regulatory requirements and commitments are properly addressed for all sites.

- Changes that removed details from existing site-specific QA and QC program implementing procedures while shifting to standardized fleet procedures contributed to the finding involving missed QC verification inspections. Condition reports at individual sites regarding problems related to this issue were not recognized collectively as symptoms of a problem with these procedures because they were addressed at the site level.

Hmm, less QA, mean faster, better, cheaper...meaning the reduction in standards boost profits and capacity factor.

Introduction: The inspectors identified a Green NCV of 10 CFR 50, Appendix B, Criterion X, "Inspection," for the failure to ensure that Quality Control verification inspections were included in quality-affecting procedures and work instructions for construction-like work activities as required by the Quality Assurance Program. Description: In response to the inspectors request for information concerning implementation of the quality oversight and verification programs, the licensee performed a review of a representative sample of engineering changes and work order tasks issued between 2006 and 2009. The licensee's review included performing equipment walkdowns, evaluating rework rates and human error rates, and causes for failures of significant components. Based on the results of these reviews, Entergy initiated condition reports at the various sites to document problems with QC verification activities and failures to perform required QC reviews of safety-related engineering changes and construction related work activities. Entergy's investigation concluded that procedures contained inadequate guidance, which resulted in inconsistent implementation of the QC Program. Specifically, some safety-related design change work orders were not reviewed to determine whether QC verification inspections were required, and some safety-related design change work orders did not include all required QC verification inspections. These examples were documented in CR-HQN-2009-01083, -01084, -01085, -01093, -01096, -01140, -01169, -01170, -01184, and -01188.

Managers in maintenance organizations did not have a detailed understanding of QC responsibilities, required inspections, or what documents required review (CR HQN-2009-01150).

- A weakness was identified in the process for ensuring proper approval of contract QC inspection personnel at all Entergy sites. Procedure EN-QV-111,"Training and Certification of Inspection/verification and examination Personnel," Section 4.0 [1], required that the Manager responsible for Quality Assurance or designee at each location is responsible for approving ANSI N45.2.6 certification of QC inspection personnel. In practice, contract QC inspectors' qualifications were not approved by the QA Manager prior to November of 2009. This was determined to be a minor violation because the ANSI Level III inspector at each site was documenting that the contract QC personnel had the necessary qualifications to perform the inspections for which they were contracted. This issue was entered into the licensee's CAP as CR-HQN-2009- 1091.
- At individual Entergy plants, 27 CRs were written in 2008 and 2009 to document potentially missed QC verification inspections or missed reviews to consider QC verification inspections prior to the NRC engaging Entergy on this issue. Of those, seven were actual missed inspections (CR-RBS-2009-05041, CR-JAF-2008-03648,

and CR-PNP-2008-00916 and CR-PNP-2008-03922, CR-PNP-2009-01798, CR-PNP-2009-02059, and CR-PNP-2009-02255). Multiple CRs documented work package quality issues that impacted the ability to identify appropriate QC verification inspection requirements.

- Two examples of QC programmatic issues were identified, assigned to Entergy headquarters, and not properly addressed (CR-ANO-C-2009-01884, and CR-HQN-2009-00178). These were considered examples of the violation discussed below.
- River Bend Station was using notification points instead of designating specific QC hold points (CR-RBS-2008-04685). This is further discussed in Section 4OA7.
- Insufficient resources were assigned or qualified to perform the required tasks at Grand Gulf Nuclear Station and River Bend Station. River Bend Station operated with a single QC Level II inspector for more than 3 years, and Grand Gulf Nuclear Station's two QC inspectors did not have all of the discipline certifications for which they were conducting inspections (CR-HQN-2009-01140 and CR GGN-2009-06575). While these conditions were inappropriate, the inspectors did not identify a separate violation associated with these issues. To the extent that the individuals at River Bend Station were evaluating work documents for QC verification inspections and not correctly identifying those verifications, those examples are part of the violation discussed below.
- Although equipment-related QC condition reports were addressed appropriately, QC programmatic issues were not always effectively addressed.
- QA audits and oversight activities for the QC Program missed opportunities to identify the findings of their investigation (CR-HQN-2009-01169, CR-HQN-2009-0153, and CR-HQN-2010-00013). In particular, the Entergy corporate ANSI Level III inspector was required to perform periodic surveillances of QC inspection activities to ensure the program is being adequately implemented and maintained, but these required surveillances were not performed in 2008 (CR-HQN-2009-00111). This is further discussed in Section 4OA7.

Translation: How many years has this been going on, it is very troubling? We don't have that button to give us a green, yellow red indication of the status of QA/QC. If the safety equipment meets all the safety codes. They don't yet know the magnitude of Entergy's problem of QA at the plant level. The agency is giving Entergy a public relation bonus by allowing Entergy identify and fix the safety defects themselves. The NRC allows Entergy to claim they found the QA/QC problems on their own...it was the NRC's efforts that drove everything. By the time the NRC does the inspection on the plant level, Entergy will be able to claim they discovered everything and they were self driven. The results of this, the agency is going to give the public a falsified cultural and QA/QA image of Entergy... because we can't instantly know all the defects and falsification before the correction. The true magnitude of what Entergy has done and their sin...the object of the whole game is to get Entergy to change their heart and be better.

This is nothing about the NRC fulfillment of their procedures or rules. Procedures and rules have no soul and spirit, just like a machine. They got to be doing this for a higher reason. Increasingly the NRC thinks their rules and regulations are the primary objective of what they do. It gets down to malicious compliance with congressional intent. It knowing compliance with legislative intent is going to drive our nation over a cliff. The intent of regulations is greater safety and that the utilities are in service to our nation. It gets down to NRC malignant and narcissistic compliance to legislative intent. It is what they have to do to go home and enjoy their children and families. It turning providing for your families on its head...it is altruism abuse and disorder

of the highest order. It has become such a horrendously narrow pathway...it is no doubt our politics are driving this narrow mind set.

If we magically knew everything though a push of a button of all the sins of Entergy, had a perfect image...then there would be an incentive or punishment to fit the condition driven from all we know. The objective of it all is to make a better world for ourselves. We would have a god's view of the QA/QC and safety system problems...the magnitude of the pain of punishment to Entergy would drive Entergy to reform themselves more deeply. The length of time it takes for the NRC to see the big picture, they parse the information out in way to purposely dilute the accountability...is a grand agency falsification to their bosses, us. It cheats Entergy's stockholders and ratepayers from a full recovery, as does its employees. Doesn't that bother you people, we don't have at our fingertips the ability to know all the safety equipment meets the codes and Entergy is a fully healthy nuclear utility. The things that are in the temporal dimension...in time...we don't get a image that helps us see the real sequence and magnitude of all the defects. It doesn't help us to make Entergy better. Everything is politically diluted thinking and incomplete facts...but we are following the whims and wishes of congress through our regulations and dictates , and they think that is in the nation's best interest.

> In-office NRC reviews identified the need to conduct further inspection activities. On June 14 through 17, 2010, the inspectors conducted a focused review of work performed at each NRC-licensed Entergy site to assess whether examples of missed QC verification inspections identified by Entergy during their review had the potential to have impacted the operability of important plant equipment. The inspectors also reviewed the corrective action database and maintenance records to independently assess the rigor of the Entergy review and to identify additional examples of missed QC verification inspections. The inspectors identified no additional examples, and concluded that the Entergy reviews were sufficient to identify the scope of the problems and develop actions to address the causes.
>
> Because this issue was of very low safety significance and was entered into the CAP as CR-HQN 2009-01184 and CR-HQN-2010-0013, consistent with Section VI.A of the Enforcement Policy, this violation is being treated as NCV 05000255/2010005-06: Failure to Perform Required Quality Control Inspections.)

Them comic book UFSARS' again? You laughing yet? How can this come to a good ending folks. Is capacity factor of the nuclear industry the single determinant of good or bad.

> **(Closed) Unresolved Item 05000255/2008009-03: Nonsafety Related Components Credited in Steam Generator Tube Rupture Accident Analysis**
>
> During this review, the inspectors identified conflicting information in the UFSAR. Section 14.15.2.2 of the UFSAR stated that the operators open the atmospheric dump valves 30 minutes after the reactor trip to commence plant cooldown. In contrast Section 14.15.2.1, Section 14.15.2.3, and Table 14.15-3 indicated that the operator action occurred 30 minutes after the event initiation, that is, the tube ruptures. The discrepancy was documented by the licensee in their CAP as CR-PLP-2010-03857.

Do we really need again the hear the phrase: Failure to Provide Complete and Accurate Information? I am getting sick and tired of writing the word falsification. All the employees in the nuclear industry are legally prohibited from doing this. But I bet the words of the law or

regulation is as strong as a single sheet of tissue paper. This exhausted enormous amounts of NRC money and resources coming to terms with the falsification over this with Entergy in the times of a heighten security threat. You know, the NRC is into all the risk thing to dilute accountability to the licensee. Did they take into account the heightened national state of peril. Don't get me talking about the check valve philosophy of the agency. Entergy got to do a safety cultural safety survey over this Palisade security manager falsification and inaccurate reporting to the NRC thing at Vermont Yankee...they did a survey at VY over Palisades issue...and the survey at Vermont Yankee was a complete fabrication. Meet you at the bar for our laughs about ourselves tonight guys again. In the VT-2 visual inspection, is the single determinant the perception a employee can see a crack in the reactor vessel head the only proof that is necessary defining that a crack isn't there?

> *(Discussed) Confirmatory Order, EA-09-060, November 10, 2009, Failure to Provide Complete and Accurate Information:* Inspection Scope On May 22, 2008, the NRC completed a security baseline inspection at the Palisades Nuclear Plant. The inspection covered one or more of the key attributes of the security cornerstone of the NRC's Reactor Oversight Process. As a result of the inspection observations, the NRC Office of Investigations (OI) initiated an investigation (OI Case No. 3-2008-020). Based on the evidence developed during the inspection and investigation, the NRC identified a violation of 10 CFR 50.9 for inaccurate and incomplete information. Specifically, the licensee failed to ensure that information in corrective action documents was complete and accurate in all material respects, and the licensee failed to provide accurate information to the Commission during a telephone conversation between a licensee employee and an NRC inspector.

The NRC reduced last inspection period a threat to plant operation and capacity factor by falsifying the term, we test the hardness of every coupling while trying to get a enforcement discretion. So it is closed. It is acceptable for a utility and a vender to lie to the agency if plant operation is threaten? Just where do you go for in NRC on what is the right way for you to lie the NRC? Is it in the inspection manual or reg guide?

"Licensee's failure to provide information to the NRC that was complete and accurate in all material respects"...how many more times we going to hear this out of Entergy and the NRC in the next year? "

Because violations of 10 CFR 50.9 are considered to potentially impede or impact the regulatory process"...too bad there wasn't a law the NRC had to follow "to not impede or impact" the right of the public (owners of the government) to do their Constitutional responsibility, to oversee and control their government and these corporation's grubbing for profits and societal status at any cost.

> *(Closed) Unresolved Item 05000255-2009005-01 Notice of Enforcement Discretion for Repair of Service Water Pump P-7C:* On October 1, 2009, the NRC verbally granted a NOED to the licensee to not enforce TS 3.7.8 required action A.1, B.1, and B.2. The licensee followed up with a written request on October 5, 2009. On October 6, the licensee informed the inspectors that the licensee's request for the NOED contained inaccurate information related to testing performed on the replacement couplings. At the time, the inspectors could not determine if the inaccurate information resulted in a violation of NRC requirements and opened URI 05000255/2009005-01. The inspectors have now concluded

that the licensee violated 10 CFR 50.9. The inspectors did not identify any other violations of NRC requirements. This URI is closed.

The inspectors identified a Severity Level IV NCV of 10 CFR 50.9 for the licensee's failure to provide information to the NRC that was complete and accurate in all material respects. Specifically, in a letter on dated October 5, 2009, the licensee inaccurately stated new couplings for a service water pump were independently tested prior to installation. There was not an associated ROP finding for this NCV.

In order to ensure that the replacement couplings met hardness criteria, the licensee indicated that each replacement coupling would receive a hardness test by an independent test organization. The licensee provided this information verbally during the October 1 call, and in writing in the October 5 letter. The NRC acknowledged the licensee's actions. However, each coupling did not receive an independent hardness test. Instead, the vendor sent a sample for independent testing.

After the licensee submitted the written request for a NOED, the inspectors learned that no independent hardness testing occurred on two of the couplings and the rest of the couplings had been tested using a sampling methodology. Due to potential willful aspects associated with the NOED, the inspectors provided information to the Office of Investigations for review. OI reviewed the issue to determine if licensee personnel willfully failed to provide complete and accurate information to the NRC in the NOED. OI completed the investigation, and the NRC did not substantiate, based upon the evidence, that personnel willfully failed to provide complete and accurate information to the NRC. However, information included in the Request for Enforcement Discretion dated October 5, 2009, was not complete and accurate in all material respects.

As a result, this issue was considered a performance deficiency. Using the information provided in IMC 0612, Appendix B, "Issue Screening," the inspectors determined that traditional enforcement was warranted, because violations of 10 CFR 50.9 are considered to potentially impede or impact the regulatory process.

This the biggest philosophical question out of all of this is; does following the rules, policies ,codes and procedures get us to the outcome we want. Will following the rules bring us all back home safety and soundly? Is following the rules the ends, or is these some higher calling or order we should direct our heart and heads towards?

This is what I am talking about, the little games between NRC and licensee. How the NRC intentionally rolls out the QA/QC violations, it is intended to let the licensee claim credit for what the agency found or dug up. Does this in any way make sense for a initial inspection finding that Entergy can claim credit for indentifying the violation. It is utter insanity coming from the regulator. I know, you are just following the rules.

4OA7 Licensee-Identified Violations: The following violation of very low significance (Green) or Severity Level IV was identified by the licensee and is a violation of NRC requirements which meets the criteria of the NRC Enforcement Policy for being dispositioned as an NCV. Procedure, EN-QV-111, 'Training and Certification of Inspection/Verification and Examination Personnel," Section 4.0 [4](i), requires that the Entergy corporate ANSI Level III inspector shall perform periodic (annual) surveillances

of quality control inspection activities to ensure that the program is being adequately implemented and maintained. Contrary to the above, no surveillances of quality control inspection activities were performed for any Entergy site during calendar year 2008. The issue was not suitable for quantitative significance determination, so it was assessed using IMC 0609, Appendix M, so it was evaluated using the qualitative criteria listed in Table 4.1. This finding was determined to be of very low safety significance because other quality assurance program functions remained unaffected by this performance deficiency, so defense-in-depth continued to exist. This issue was entered into the licensee's CAP as CR-HQN-2009-00111.

Based on the above, to date the NRC's Reactor Oversight Program and the inspection activities in the plant has demonstrated the inability of the NRC to change the heart of Entergy. The NRC has expended enormous resources in confronting the Palisade staff...but the situation is only getting worst. In just a few inspection reports we get to see the repetitive nature of the violation, such a the polar crane issue and the VT-2 visually reactor inspection problems. There is the sense Entergy across the board is toying with the agency...trying to exhaust the capabilities of local inspectors with a assortment of bureaucratic games.

As we know, the inspection on problems with QA/QC is incomplete...we have no idea of the magnitude of the problems as stated by the NRC at the plant level. I request Palisades be shutdown and stay shutdown until all the problems with QA/QC are thoroughly investigated and fixed. I request all employees who gave false and incomplete information to the agency be prosecuted to the fullest extent of the law. I request any employee who knew about this or should have known about it...be not allowed to work in nuclear related activities.

1) Request Palisades nuclear power plant and all Entergy nuclear power plants be immediately shutdown.
2) Request top Palisades Management staff be fired and replaced before startup.
3) Request Entergy's corporate nuclear senior staff be fired and replaced before the restart of the plants.
4) Immediately request two addition NRC inspectors to be assigned to Palisades plant, and to all the rest of the troubled Entergy nuclear plants. There seems to be a few plants of the bunch that behave themselves.
5) Request the formation of a local public oversight panel around every plant.
6) Request a emergency NRC senior official oversight panel with the aims of reforming the ROP.
7) Request a national NRC oversight panel of outsiders to oversee and report on the agency's activities. There should be a mixture of professional academic people and capable lay people.
8) There is some heavy duty and exceedingly numerous findings of problems with Entergy plants' this inspection reporting cycle...do an analysis of why this is occurring.
9) Request a evaluation if NRC region III has enough personnel and resources.

One must remember in a organization that violates the rules and lies so often you have set up a honor culture and cult of enforcers. I cover your back, you cover my back, no matter how unethical we become. You got to have a enforcer system so employees don't disclose secret violation of federal rules to outsiders. You separate your employees into two groups. The groups maybe expressed as 'them' and 'us', or maybe the 'good guys' against the 'bad guys' . The top group enforces the behavior of the bottom group. You get promoted on who you blow, and not

what you know. Generally management exaggerate the faults and good deeds of the people they choose for no other reason than they will systemically violate codes of conduct. If you are a 'good guy' your faults are down played. If are one of 'them' the good catches are never documented, never acknowledged, absent in the employee evaluation, and forget about getting a promotion. A dead ender plant ends up in a full scale war between the groups. Then employees' spend all their time trying to sabotage each other or trying to slit the throats of each other's careers. It is really a amazing thing to be in a organization that is at war with themselves.

Sincerely,

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omta08.emeryville.ca.mail.comcast.net with comcast id B6mZ1g02N2J5iRe8U6n3EZ;
Tue, 22 Feb 2011 18:47:06 +0000
From: Michael J Mulligan <steamshovel2002@comcast.net>
To: <allegation@nrc.gov>
Subject: Request Emergency Palisades shutdown
Date: Tue, 22 Feb 2011 13:46:40 -0500
Message-ID: <A4200065141946FC896D80AB2205E496@mikesPC>
MIME-Version: 1.0
Content-Type: multipart/alternative;
boundary="----=_NextPart_000_0003_01CBD296.F0AB5A00"
X-Mailer: Microsoft Office Outlook 11
Thread-Index: AcvSwNccyHGCjVV2Sf2jMp4UZyaj0w==
X-MimeOLE: Produced By Microsoft MimeOLE V6.0.6002.18263
Return-Path: steamshovel2002@comcast.net