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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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10 CFR 2.206 PETITION REVIEW BOARD (PRB)

CONFERENCE CALL

RE

VERMONT YANKEE

+ + + + +

TUESDAY

APRIL 12, 2011

+ + + + +

The conference call was held, Melanie Galloway,
Chairperson of the Petition Review Board, presiding.

PETITIONER: MICHAEL MULLIGAN

PETITION REVIEW BOARD MEMBERS

MELANIE GALLOWAY, Deputy Director, Division of License
Renewal, NRR

JAMES KIM, Petition Manager for 2.206

Petition, NRR/Division of Operating Reactor
Licensing

ANDREA RUSSELL, Petition Coordinator, NRR/Division of
Policy and Rulemaking

1 NRC HEADQUARTERS STAFF:

2 NANCY SALGADO, Branch Chief, NRR/Division of

3 Operating Reactor Licensing

4

5 NRC REGION I STAFF:

6 THOMAS SETZER, Division of Reactor Projects

7

8 ALSO PRESENT:

9 JIM DEVINCENTIS, Entergy Nuclear Vermont Yankee

P R O C E E D I N G S

8:59 a.m.

MR. KIM: Good morning. I'd like to thank everybody for attending this meeting. My name is James Kim and I'm the Vermont Yankee Project Manager.

We are here today to allow the Petitioner, Mr. Michael Mulligan, to address the Petition Review Board regarding to 2.206 petition dated March 25, 2011.

I'm the Petition Manager for the petition. The Petition Review Board chairperson is Melanie Galloway.

As part of the Petition Review Board, review of this petition, Mr. Michael Mulligan has requested this opportunity to address the PRB.

This meeting is scheduled from 9 to 10 a.m. The meeting is being recorded by the NRC Operations Center and will be transcribed by a court reporter. The transcript will become a supplement to the petition. The transcript will also be made publicly available.

I'd like to open this meeting with introductions. As we go around the room, please be sure to clearly state your name, your position, and the office that you work for within the NRC for the

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1 record. I'll start off.

2 This is James Kim. I'm a Project Manager
3 for the Division of Operator Reactor Licensing in NRR.

4 MS. SALGADO: I'm Nancy Salgado. I'm the
5 Branch Chief in the Division of Operator Reactor
6 Licensing in NRR.

7 MS. RUSSELL: Andrew Russell, Division of
8 Policy and Rulemaking 2.206, Division Coordinator.

9 MS. GALLOWAY: I'm Melanie Galloway. I'm
10 the Deputy Director of the Division of License Renewal
11 in NRR.

12 MR. KIM: At this time are there any NRC
13 participants from the headquarters on the phone?

14 (No response.)

15 Are there any NRC participants from the
16 Regional Office on the phone?

17 MR. SETZER: Yes, hi. Good morning. This
18 is Tom Setzer. I'm a Senior Project Engineer in
19 Region I.

20 MR. KIM: Are there any representatives
21 for the licensee on the phone?

22 MR. DEVINCENTIS: Yes. This is Jim
23 Devinentis of Entergy Nuclear Operations.

24 MR. KIM: Mr. Mulligan, would you please
25 introduce yourself for the record?

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1 MR. MULLIGAN: I'm Mike Mulligan and I was
2 a licensed operator at Vermont Yankee and I'm a
3 whistleblower on a lot of issues other than nuclear
4 power, but mainly nuclear power.

5 MR. KIM: Thank you. It is not required
6 for the members of the public to introduce themselves
7 for this call. However, if there are any members of
8 the public on the phone that wish to do so at this
9 time, please state your name for the record.

10 (No response.)

11 Hearing none, I'd like to emphasize that
12 we each need to speak clearly and loudly to make sure
13 that the court reporter can accurately transcribe this
14 meeting. If you have something you would like to say,
15 please first state your name for the record.

16 For those dialing into the meeting, please
17 remember to mute your phone to minimize any background
18 noise or distractions. If you do not have a mute
19 button, this can be done by pressing the keys *6 . To
20 unmute, press the *6 keys again. Thank you.

21 At this time, I'll turn it over to the PRB
22 Chairperson Melanie Galloway.

23 MS. GALLOWAY: Good morning. Welcome to
24 this meeting regarding the 2.206 petition submitted by
25 Mr. Mulligan.

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1 I'd like to first share some background
2 information on our process. Section 2.206 of Title X
3 of the Code of Federal Regulations describes the
4 petition process, the primary mechanism for the public
5 to request enforcement action by the NRC in a public
6 process. This process permits anyone to petition NRC
7 to take enforcement-type action related to NRC
8 licensees or licensed activities. Depending on the
9 results of its evaluation, NRC could modify, suspend,
10 or revoke an NRC-issued license or take any other
11 appropriate enforcement action to resolve the problem.

12 The NRC staff's guidance for the
13 disposition of 2.206 petition request is in Management
14 Directive 8.11 which is publicly available.

15 The purpose of today's meeting is to give
16 the Petitioner, Mr. Mulligan, an opportunity to
17 provide any additional explanation or support for the
18 petition before the Petition Review Board's initial
19 consideration and recommendation.

20 A few points to note: this meeting is not
21 a hearing, nor is it an opportunity for the Petitioner
22 to question or examine the PRB on the merits or the
23 issues presented in the petition request. No
24 decisions regarding the merits of this petition will
25 be made at this meeting.

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1 Following this meeting, however, the
2 Petition Review Board will conduct its internal
3 deliberation and the outcome of this internal meeting
4 will be discussed with the Petitioner, Mr. Mulligan.
5 The Petition Review Board typically consists of a
6 chairperson, usually a manager at the Senior Executive
7 Service level at the NRC. It has a Petition Manager
8 and PRB Coordinator. Other members of the Board are
9 determined by the NRC staff based on the content of
10 the information in the petition request.

11 At this time, I would like to introduce
12 the Board. As Mr. Kim already noted, my name is
13 Melanie Galloway. And for this petition, I am the
14 Petition Review Board Chairperson. Mr. Jim Kim is the
15 Petition Manager for the petition under discussion
16 today and Ms. Andrea Russell is the Office's PRB
17 Coordinator. Our technical staff includes Mr. Thomas
18 Setzer from NRC Region I's Division of Reactor
19 Projects.

20 As described in our process, the NRC staff
21 may ask clarifying questions of Mr. Mulligan in order
22 to better understand his presentation and to reach a
23 reasoned decision whether to accept or reject his
24 request for review under 2.206 process.

25 At this point, I would like to summarize

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1 the scope of the petition under consideration and the
2 NRC activities to date. On March 25, 2011, Mr.
3 Mulligan submitted to the NRC a petition under 2.206
4 in which he expressed a concern on the following
5 nuclear plant safety systems at Vermont Yankee that he
6 described in his petition as non-testable. The first
7 one is the automatic depressurization system or ADS,
8 the main steam safety relief system. The second one
9 is the Vernon tie. The third is the service water
10 system and RHR system tie and the emergency cooling
11 tower cell which is the backup cooling system for the
12 emergency diesel generators. The fourth is the
13 alternate shutdown outside the control room, that is,
14 the Vernon tie inside of the service water RHR cross-
15 connect. And the fifth one is the emergency core
16 cooling system functional test at every outage.

17 In this petition request, Mr. Mulligan
18 made several requests of NRC. The first, he requested
19 all non-testable safety systems be immediately tested
20 or the plant shutdown. Second, Mr. Mulligan requested
21 an outside the NRC investigation of this NRC behavior
22 for tolerating this atrocious regulatory behavior.
23 Third, he requested that top Vermont Yankee management
24 staff be fired and replaced before startup. Fourth,
25 Mr. Mulligan requested that Entergy's corporate

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1 nuclear senior staff be fired and replaced before the
2 restart of the plant. Fifth, he requested the
3 formation of a local, public oversight panel around
4 every nuclear power plant. Sixth, Mr. Mulligan
5 requested an emergency NRC senior official oversight
6 panel with the aims of reforming the reactor oversight
7 process. Seventh, he requested a national NRC
8 oversight panel of outsiders to oversee and report on
9 the Agency's activities. And he further suggested
10 that there should be a mix of professional, academic
11 people and capable lay people. Eighth, Mr. Mulligan
12 stated that there is some heavy duty and exceedingly
13 numerous findings of problems with Entergy plants
14 during this inspection reporting cycle and that there
15 should be an analysis of why this is occurring. And
16 last, Mr. Mulligan requested a list of non-testable
17 nuclear safety systems countrywide.

18 Not let me summarize the NRC activities to
19 date. On March 31st of 2011, Mr. Mulligan requested
20 an opportunity to address the Petition Review Board by
21 telephone which is the purpose of today's call. On
22 April 5th of 2011, the Petition Review Board met
23 internally to discuss the request for immediate action
24 of emergency shutdown of Vermont Yankee. The PRB
25 denied the request for immediate action because there

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1 was no immediate safety concern to the plant or to the
2 health and safety of the public. On April 5, 2011,
3 Mr. Mulligan was informed of the PRB's decision on the
4 immediate action.

5 Now as a reminder for phone participants,
6 please identify yourself if you make any remarks, as
7 this will help us in the preparation of the meeting
8 transcript that will be made publicly available.
9 Thank you.

10 At this point, Mr. Mulligan, I'll turn it
11 over to you to allow you an opportunity to provide any
12 information that you believe the Petition Review Board
13 should consider as part of your most recent petition.

14 Mr. Mulligan?

15 MR. MULLIGAN: Wow, another chairman? I
16 welcome that it's the first time the PRB, a female,
17 was a chairman and I welcome that, this. I haven't
18 seen this before and it's a good thing.

19 Anyway, non-testable safety system is
20 generally -- both systems are papier-mache systems.
21 They're generally systems that aren't tested to their
22 function. They might be minimally tested. Parts of
23 it might be tested. The holistic system is never
24 tested, that type of thing.

25 Like I said, I've been saying these

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1 problems with these nuclear plants never come from a
2 tsunami or an equipment failure. It's a people
3 failure. It's a communications failure. We misuse
4 language. We start to use language more to hide
5 things than to disclose things, that type of thing.
6 And we get into -- it just builds and builds and we
7 essentially start turning off safety systems, either
8 we flip a switch or we use less quality in the
9 components. And we essentially turn off safety
10 systems one by one until we get into a lot of trouble.

11 In 1992, to go back shortly, I talked
12 about this in the recent Palisades 2.206, but I had
13 issues with fuel pool pump intermittent short on a
14 fuel pool pump. They had a requirement to shift on
15 the reactor in 30 days. They didn't have an on-site
16 spare for the motor and then everybody started playing
17 word games and they caution-tagged the breaker and
18 then they danger-tagged the breaker. And everybody
19 was afraid to call it in-op, as it was. I mean we
20 didn't have any engineering proof of the
21 uncertainty gaming I've talked about. We didn't have
22 any proof really of the condition of the motor. I
23 mean they made assertions from -- Vermont Yankee made
24 assertions of the conditions of the motor. There was
25 a short in it, but they didn't have any proof that

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1 they called it intermittent short. And then they
2 danger-tagged it, but they wouldn't call it in on.

3 And so, you know, there's essentially
4 language games. We play games with words and language
5 and that got me to make the complaint to the governor,
6 as I explained. I mean they didn't have an on-site
7 motor to replace it. And so we played around for a
8 year until finally, you know, I made my complaint. We
9 got an investigation about that.

10 Generally, I said that Vermont Yankee was
11 heading for problems. We're going to have an accident
12 that we're going to have a lot of equipment failures.
13 We're going to have a trip, a simple trip, and we're
14 going to be confused by a set of equipment failures.
15 A year later, I was up in License Training, they were
16 getting ready to take my license from me. And I got
17 a call and they said Mike, we had an accident at the
18 plant and we need you to come down for overtime. And
19 that was the accident essentially that I predicted.
20 We had -- they were taking shortcuts out in the
21 switchyard. They were trying to replace a switchyard
22 power supply and protection system batteries. I guess
23 they got -- had issues with the batteries and finally
24 were forced to replace them. They should have
25 replaced them during the outage. They didn't.

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1 And we're up at power and they basically
2 what ended up -- they ended up supplying -- there was
3 two sides of the safety circuits for the switchyard
4 and they cross-connected them, as insane at that
5 sounds. And then they tried to power them from one
6 charger, from one battery charger.

7 An operator disconnected the second
8 battery thing and of course the battery charger went
9 wild and the battery charge in itself was in a
10 degraded state, unknown state, with diode problems,
11 stuff like that. They had all sorts of warnings in
12 the past about these charges could go bad and stuff
13 like that and they never took action to correct them.

14 I mean that's just another symptom of the
15 problem with the defective equipment and so the power
16 surge knocked out all the breakers in the switchyard.
17 There was a loss of off-site power. I believe it was
18 like maybe 12 to maybe 24 hours later on before we
19 regained power into the plant. We were on the diesel
20 generators, the diesel generators at -- they had a
21 valve that was out of position. They discharged both
22 these generators -- they went into a common header and
23 the valve was throttled and they never thought about
24 that throttling that valve would have consequences
25 when there was excess -- well, excess or surface water

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1 flow needed to supply the diesel generators.

2 Mind boggling group of problems. Really
3 not equipment problems, but people problems and stuff,
4 like we all know besides diesel generators, to
5 increase the flow of the diesel generators, a surface
6 water flow to diesel generators, we know what happened
7 if we had a LOOP or a LOCA when we would have needed
8 torus cooling and if there had been additional flow
9 into that throttle valve and stuff like that.

10 I mean that LOOP was kind of an amazing
11 accident. When it was all said and done with, I
12 actually talked to my friends in the media and Vermont
13 Yankee was playing games with disclosure of what was
14 going on. It's just a terrible environment to be in
15 when everybody is hiding stuff, and they're afraid to
16 talk about what the problems and all that sort of
17 stuff and to the outsiders. It's just a terrible
18 environment when really these complicated
19 bureaucracies, what is needed is accurate
20 communications and freedom to say what you want.

21 And when it was all said and done, they
22 had the state engineer in the media talking about the
23 burning time and he was talking about oh well, even
24 though we had diesel generator power and if we didn't
25 have it, we'd always go to the tie. And at the time,

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1 the tie was never tested. I mean there was no testing
2 whatsoever and again, that was -- these systems like
3 this, at that time was a ghost system, a papier-mache
4 system, you know. There was no proof, evidence that
5 that -- that it would work, that we would have
6 capability to get on a tie. Of course at that time,
7 DBPS owned it, Vermont Yankee and the dam which
8 doesn't happen now. But anyway -- that's when we all
9 became exposed to the delusional, these mirage systems
10 that are designed really not to do a function other
11 than be talking points to people, favorable to the
12 nuclear industry.

13 And again, those kind of systems, you
14 know, when we talked about them to ourselves, we'd say
15 what are the chances of those, we're going to be able
16 to get that right and stuff? Again, the question is,
17 well, with the tie working is an issue, but the other
18 issue is what does it do to everybody? What does it
19 do the conscience of the employees when they know that
20 some of these systems, how we know about operations
21 and how equipment works and stuff like that, you know.
22 And how problems get hidden inside for some and you
23 don't see them and the only way you discover them is
24 when you start banging equipment around and using
25 them. And so that's how I became aware of how we have

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1 these systems that are designed for talking points,
2 really not designed to protect the plant.

3 The Vernon tie, put in new cables. They
4 test them a little bit, but again, they really don't,
5 they don't -- the only way you really test it would
6 be, you know, probably now they scheduled it and
7 nobody gets surprised like in an accident. One day,
8 bang, something happens and you know, the Vernon
9 station or distant control rooms for the Vernon
10 station, you know, they get the call and it actually
11 becomes tested.

12 The fire system is another one of these
13 ghost systems when you really get down to it. It's
14 a backup means beyond design type of thing to cool the
15 core. And again, you sit there and say well, okay,
16 another time turning the fire system into an ECCS
17 system in the most vulnerable position the plant can
18 be in when all the safety systems have been stripped
19 from them and they only had one system left and it
20 really doesn't have the quality of nuclear safety
21 system. It has additional standards of quality, but
22 it doesn't meet the quality of an ECCS system and
23 stuff.

24 It's just these sub-standard, sub-quality
25 systems that people should be concerned about. I

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1 think it's immoral and stuff, that damages the
2 employees in one way. It damages the culture of the
3 employees and it's questionable whether that the RHR
4 service waters system, I imagine they don't -- when I
5 was there they didn't do a real-life test.

6 When I was there, they used to have --
7 they had problems with -- I forget what it was, the
8 inlet or outlet, but they had -- mud would form down
9 there at the pipes and it was clogged for many years.
10 And it wouldn't work, type of thing.

11 The RHR service water forced the closed
12 system and it cools diesel generators and it cools
13 torus cooling, if necessary. And you know, I don't
14 think -- I just think that the public needs to have a
15 higher level of quality with those kind of backup
16 systems. You just can't have backup systems with less
17 quality and less training and you end up -- you say
18 well, I have all these backup systems so all the
19 front-line safety systems, you justify well, RHR is
20 down today, but because we have so many backup
21 systems, it doesn't really matter what the RHR system
22 does or defects it has in it. It ends up creating
23 this justification system where you tolerate a lot of
24 defects and you tolerate, you discover defects and you
25 make consequences to it. So you tolerate more defects

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1 in these complex systems.

2 So really the RHR service water cross-
3 connect, why wasn't there -- I know it would be
4 traumatic for the plant to actually shift to that, but
5 you should at least do it once and periodically. You
6 say you have simulators, simulator testing on that and
7 everybody knows that the simulator almost sets you up
8 for a non-official environment. The simulator could
9 have fidelity issues. There's no -- you simulate
10 people running around, I imagine, and stuff like that,
11 but I don't think -- you don't actually test equipment
12 and open up valves, that are open. You don't get that
13 time, that real time -- it takes so long for not being
14 able to run out, to open up a valve or -- those
15 systems should be automatic. You should be able to
16 push a button, really, and everything aligns up in a
17 right way. And you know, the control the system like
18 that. You should -- what are we doing nowadays,
19 having these backup systems that are never tested that
20 are clunky and aren't automated. And it doesn't eat
21 up shift resources.

22 And you know, you get into events -- if
23 you're in a fire and someplace else in the plant and
24 then you're going to go on RHR, service water RHR
25 cross-connect. I mean, how many people have you got

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1 on the site?

2 When I made my complaint to the Vermont
3 governor, one of the issues was I didn't think we were
4 -- with alternate shutdown procedure outside the
5 control room, I didn't think we could -- that system
6 would work. We didn't have enough people. I was
7 thinking and I got into that investigation on that,
8 When I made that complaint to the governor and stuff,
9 so I've always had problems with this alternate
10 shutdown business. I always thought it was too
11 complicated. Nobody ever tested it. We got a lot of
12 panels out there, RCIC, locally, and connected to the
13 release, locally, you know, that sort of stuff.

14 You know, we have the technology nowadays
15 and we should be able to -- if we say we're going to
16 have a safety system, then we should be able to test
17 it. We should be able to do that. And it's more than
18 having the equipment there. It's people testing it
19 over and over again and you are getting all the bugs
20 out of it and that type of thing. So you really don't
21 end up with very many surprises when the big boom
22 happens, you know. You know what I'm saying?

23 To get back to the Vernon tie, everybody
24 knows that last -- the first time that I had a
25 petition on that, shortly after that, the NRC went

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1 through the alternate shutdown system and they found
2 a flaw in the main feed pumps on that trip. And they
3 dinged Vermont Yankee on that. That's kind of
4 surprising in this late stage of the game that the NRC
5 would find a flaw with all those extremely trained
6 employees at Vermont Yankee and all the people with
7 the degrees and all that sort of stuff. You'd think
8 they'd scrub the alternate shut-down procedure
9 perfectly clean. You know? And there wouldn't be a
10 flaw in it and stuff.

11 You know, those different things that you
12 discover, you know, if you're able to test the system,
13 you can have a bunch of people on site and as you cool
14 down the reactor and stuff like that you get into
15 trouble. You got extra people to help you out and
16 stuff, but you know, I just think that that that's the
17 philosophy, the big philosophy in nuclear industry
18 where they have diverted to these ghost systems, you
19 know, that don't really, aren't really tested that
20 much and there's not much confidence they will work
21 with the employees and stuff.

22 And it's more used to calm the public that
23 we have more than we really have type of thing. That
24 bothers me.

25 Injecting boron into the vessel. Has

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1 anybody ever actually done that? Although that's a --
2 has that actually shut down a large reactor? I don't
3 think so. I've never -- we've never seen the proof.
4 The F system that powers the reactor coolant valves
5 and stuff like that, have you ever had an actual test
6 on that of system conditions?

7 In 9/11, there's all these systems and
8 procedures in 9/11. You know, how are we to know that
9 these are additional ghost systems or papier-mache
10 systems? It's done to calm the people outside the
11 plant and not actually systems, real systems that will
12 work. Who vets those systems? Who sits there with
13 their skeptical eye and tries to find holes in it?
14 Those are the security issues that I've had. When it
15 gets right down to it, you use security to hide ghost
16 systems or they're used to carry -- protect the
17 public. And that's what it gets down to, you know?
18 The language gaming and the word gaming and -- how do
19 we know that you're not using language to con us, to
20 talk to us? How do we know that we're not using
21 security as another tool to hide plant problems?
22 That's what it comes down to. That's one of the
23 greatest sins I think you could commit if you
24 undermine the issues around potential terrorism and
25 stuff like that. If you use security -- we know that

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1 in TVA, up in their refuel, they showed us images of
2 those hoses that were connected up to -- the header of
3 these stand-by systems and stuff.

4 One moment, they're security and nobody
5 talks about it. The next moment, when people get into
6 trouble, when the industry has a black eye, everybody
7 starts showing the stuff a year ago a super secret.
8 It doesn't really make sense to me anyway. People
9 playing around and saying they're doing one thing and
10 having -- saying they're following rules and security
11 is a secret, a responsibility. The next minute
12 they're just throwing these things out to try and save
13 themselves. It just doesn't make sense.

14 (Pause.)

15 The myth was that in old days as the
16 industry was developing --

17 MS. GALLOWAY: Mr. Mulligan?

18 MR. MULLIGAN: Yes.

19 MS. GALLOWAY: Is now an appropriate time
20 ask you if any individuals on the phone have any
21 clarifying questions of you?

22 MR. MULLIGAN: Can I just have one more
23 minute?

24 MS. GALLOWAY: Sure.

25 MR. MULLIGAN: The myth was in the old

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1 days, you know, that the NRC controlled the utilities.
2 They used the rules and regulations to control the
3 utilities, campaign contributions, and politics have
4 twisted this around and so the rules and policies are
5 not there to patrol the utilities. They're there to
6 control the NRC and to control the NRC inspectors and
7 stuff. So there's been a shift with this deregulation
8 business and putting the -- making the inspectors
9 hamstrung by following the rules and not using the
10 rules to control the behavior of the utilities.

11 Now I'm done.

12 MS. GALLOWAY: Thank you for comments, Mr.
13 Mulligan. And at this time I'd like to ask if there's
14 any staff at headquarters that has any questions for
15 Mr. Mulligan?

16 Seeing none, is there any questions from
17 our regional representative, Mr. Setzer?

18 MR. SETZER: No questions from the region,
19 thank you.

20 MS. GALLOWAY: Does the licensee
21 representative have any questions?

22 MR. DEVINCENTIS: No, Entergy has no
23 questions.

24 MS. GALLOWAY: Okay. We didn't get an
25 acknowledgement that were any members of the public on

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1 the phone, but I am going to ask at this time if there
2 do happen to be any members of the public they may
3 provide comments regarding the petition and ask
4 questions about the 2.206 petition process. However,
5 as noted at the beginning of the meeting, the purpose
6 of the meeting is not to provide an opportunity for
7 the Petitioner or the public to question or examine
8 the Petition Review Board regarding the merits of the
9 petition request.

10 So are there any questions from any
11 members of the public on the process?

12 Hearing none, I would like to take this
13 opportunity to thank Mr. Mulligan for taking his time
14 to provide the NRC staff with this information on the
15 petition that's been submitted. And before we close,
16 does the court reporter need any additional
17 information for the meeting transcript?

18 COURT REPORTER: Hello, this is the court
19 reporter. I did have one question. One of the things
20 mentioned in the petition was the Vernon tie or
21 burning tie, what was that phrase?

22 MS. GALLOWAY: Vernon tie, V-E-R-N-O-N.

23 COURT REPORTER: And tie, just T-I-E?

24 MS. GALLOWAY: Correct.

25 COURT REPORTER: Okay, thank you, Ms.

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1 Galloway.

2 MS. GALLOWAY: Sure. And with that this
3 meeting is concluded and we will be terminating the
4 phone connection at this point and continuing with our
5 deliberations regarding the petition as discussed at
6 the beginning of the call.

7 Thank you all very much.

8 (Whereupon, at 9:39 a.m., the conference
9 call was concluded.)

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CERTIFICATE

This is to certify that the attached proceedings
before the United States Nuclear Regulatory Commission
in the matter of: Vermont Yankee

Name of Proceeding: 10 CFR 2.206 Petition of
Michael Mulligan

Docket Number: (n/a)

Location: (teleconference)

were held as herein appears, and that this is the
original transcript thereof for the file of the United
States Nuclear Regulatory Commission taken by me and,
thereafter reduced to typewriting by me or under the
direction of the court reporting company, and that the
transcript is a true and accurate record of the
foregoing proceedings.



Kayla Gamin
Official Reporter
Neal R. Gross & Co., Inc.