

EDO Principal Correspondence Control

FROM: DUE: 02/10/12

EDO CONTROL: G20120022  
DOC DT: 01/10/12  
FINAL REPLY:

Mike Mulligan  
Hinsdale, New Hampshire

TO:

Borchardt, EDO

FOR SIGNATURE OF :

\*\* GRN \*\*

CRC NO:

Leeds, NRR

DESC:

2.206 - Request Emergency Palisades Shutdown  
(EDATS: OEDO-2012-0028)

ROUTING:

Borchardt  
Weber  
Virgilio  
Ash  
Mamish  
OGC/GC  
Pederson, RIII  
Burns, OGC  
Mensah, NRR  
Banic, NRR  
Scott, OGC  
Bowman, OEDO

DATE: 01/12/12

ASSIGNED TO:

NRR

CONTACT:

Leeds

SPECIAL INSTRUCTIONS OR REMARKS:

Template: EDO-001

E-RIDS: EDO-01

# EDATS

Electronic Document and Action Tracking System



**EDATS Number:** OEDO-2012-0028

**Source:** OEDO

## General Information

**Assigned To:** NRR

**OEDO Due Date:** 2/10/2012 11:00 PM

**Other Assignees:**

**SECY Due Date:** NONE

**Subject:** 2.206 - Request Emergency Palisades Shutdown

**Description:**

**CC Routing:** RegionIII; OGC; Tanya.Mensah@nrc.gov; Merrilee.Banic@nrc.gov; Catherine.Scott@nrc.gov

**ADAMS Accession Numbers - Incoming:** NONE

**Response/Package:** NONE

## Other Information

**Cross Reference Number:** G20120022

**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

**Signature Level:** NRR

**Sensitivity:** None

**Urgency:** NO

**Approval Level:** No Approval Required

**OEDO Concurrence:** NO

**OCM Concurrence:** NO

**OCA Concurrence:** NO

**Special Instructions:**

## Document Information

**Originator Name:** Mike Mulligan

**Date of Incoming:** 1/10/2012

**Originating Organization:** Citizens

**Document Received by OEDO Date:** 1/11/2012

**Addressee:** R. W. Borchardt, EDO

**Date Response Requested by Originator:** NONE

**Incoming Task Received:** Letter

Jan 10, 2012: Request Emergency Palisades shutdown

Jan 10, 2012

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

Dear Mr. Borchardt,

The Poppersville Town Hall  
<http://steamshovel2002.blogspot.com/>

Request Emergency Palisades Shutdown  
<http://pbadupws.nrc.gov/docs/ml1105/ml1105067>

What are we, on the sixth or seventh shutdown within a year, certainly five plant trips. Does all these trips and shutdowns caused fuel damage? This is how I began my Feb 22, 2011 2.206:

“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.

Jan18, 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."*

Did you like this from Feb 22, 2011?

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."

Here is some quotes from the old Feb 22, 2011 2.206?

*"The CRDM seal leak and other repetitive problems drive organization into cycles of dysfunction and disorder."*

*"We worry Palisades will steal NRC resources from finding problems at another plant."*

*"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."*

*"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?"*

*"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."*

*"It seems they'd rather keep the agency busy on games with old problems so they wouldn't find new dangerous problems." (AFP trip throttle vlv spurious trip)*

*“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?”*

*“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...”*

*“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.”*

*“This is all a game and its disconnected from ethics and morality.”*

*“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.”*

*“We knew the UFSAR was so simple minded and lacking of any real information, we called them our comic books.”*

*...“We worry if the NRC is participating in some kind of malicious, malignant or narcissistic compliance issues over regulations with congress, a narcissistic technical ideology that is destroying the industry. Basically self interested ideology and technical propaganda overrides the facts.”*

*“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.”*

*“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.”*

*...“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!"*

*"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."*

*"How come there is no talk with the NRC that our oversight activities have absolutely no affect over Entergy and Palisades?"*

*"God help us all, can you see the problem with the repetitive nature of Entergy having the instincts to not the due 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."*

*"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."*

*"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."*

*"Are all you people idiots in Michigan? You too hard up for telling truth because of low employment and economic problems."*

*"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."*

*"Managers in maintenance organizations did not have a detailed understanding of QC responsibilities, required inspections, or what*

*documents required review (CR HQN-2009-01150).” (No shit, the DC short)*

*“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.”*

*“Doesn’t that bother you people, we don’t have at our fingertips the ability to know if 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.”*

*“Them comic book UFSARS again?”*

*“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?*

*“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 there some higher calling or order we should direct our heart and heads towards?"*

Feb 22, 2011:

*"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 violations, such as 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."*

You think this cheapskatism and local contempt to the community is limited to Palisades and Vermont Yankee. You can see the beginning of this corporate business philosophy rummaging thought Vermont in 2007 and crashing into Michigan through 2011. I going to tell you something about Entergy's reform affords across many years and many states. They are really good at talking and giving pretty wordy side show presentations that are eye catching. It is going to take firing of Entergy executives really high up to change this. But their history is they don't mean a thing in talking to the public. The only thing that matters for these cold hearted people is the \$2 million dollar they collect every day for a plant to be connected to a grid. The pattern is they will lie though their teeth in the presentation to get to their \$2 million dollars a day jackpot tomorrow. (Jan 11, 2012 DC plant trip and service water NRC presentation)

## **GMP, CVPS file lawsuit against VY over tower collapse**

Posted: 01/10/2012 10:50:47 AM EST  
Updated: 01/10/2012 10:57:20 AM EST

BRATTLEBORO - Vermont's two largest utility distributors have filed a lawsuit against Vermont Yankee's parent company, Entergy, in Vermont Superior Court in Windham County.

Green Mountain Power and Central Vermont Public Service have filed a joint lawsuit over costs resulting from the plant's failed cooling tower in 2007 and 2008.

"This case arises out of Entergy's breach of its contractual obligation to us 'Good Utility Practice' in its management and operation of the Vermont Yankee Nuclear Station," the companies stated in a joint statement this morning.

### Palisades and Entergy Engineering Philosophy

With the service water coupling, first it was the heat treatment and then intergranular stress corrosion cracking and hardening...you tailor your engineering judgment into the smallest consequence to the plant outcome independent of the real factor. How often does Entergy do this, tailor a engineering judgment to limit short term economic damage to its stock price instead of confronting the real problem?

### Service Water Coupling

So from impeller to motor it is 40 feet...you got some 40 odd feet of pump shaft. I tell you what, the coupling and the pumps shaft looks pretty small for the pump capacity and it length. As far as I know, you got 6 nylon or rubber bushing that radically support the extremely long pump shaft between motor and impeller.

So the furthest couplings from the impellers failed....the 5 and 6 coupling. I been reading coupling failures with IGSCC that have been out of water and dry for many years and in standby. Palisades use these guys much more that...the wetting and drying corrosion theory. I don't buy the wetting and drying IGSCC are applicable.

You should be worried why only the closest to the motor couplings have failed? According to the NRC:

2006 – INPO Operating Experience Digest 2006-02 – INPO released a document that discusses SW pump (shaft, coupling and impeller) failures occurring in the industry. The report noted that 12 failures occurred between 1998 and 2006, with the most frequent including corrosion causing coupling separation. One of the common causes identified was improper heat treatment of the material during manufacturing; and

February 9, 2007 – NRC Information Notice 2007-05, "Vertical Deep Draft Pump Shaft and Coupling Failures," was issued and referenced the coupling failures from IGSCC that occurred at Columbia Generating Station. The couplings were 410 Martensitic SS and were susceptible to tempering embrittlement. The operating experience

review identified at least 23 essential SW pump shaft and coupling failures since 1983 involving more than six different manufacturers.

I have zero faith, especially with the voluntary INPO and other private data bases that all the coupling failures and near misses are documented. There is supposed to be punishment if they don't report to the government instead of this wholly voluntary groups paid by the nuclear utilities. So we got 35 failure and some might be double counted. A data fanatic would be sick that a true count wasn't available and a detailed written evaluation of each. I know at other plants some of the coupling failure have occurred near the motor. One wonders how many of the coupling failures industry wide are near the top. It goes to show you how shallow this Palisades coupling investigation is.

What is also missing, a discussion on the condition of the impeller intake screen and the conditions of the impeller. Are there indications sand or intrusion damage on these components?

It is common sense with the motor the stand-still inertia with the two SS impellers and all the seven lengths of shafts and the couplings themselves fights the motor start-up. With the huge 40 foot length and the weight of all the components, I think the top of the narrow shaft bows and wobbles, and the shafts and the couplings torsions and twist. When the pumps are started, the whole shaft and couplings get tensioned. Its electric motor starting causes elastic and inelastic repeated deformation of exspecially the upper shafts and couplings. The upper area of the shaft near the motor carries all the stand still inertia of the components. This creates enormous stress in the fragile upper coupling leading to micro cracks on the surface of the couplings. This then allows IGSCC to set in. I would like to see the startup and shutdown record on all the pumps...is there an association? I suspect demanding large capacity increases of water cause the same thing. I'd like to know what the resonance and harmonic frequencies are in the upper area. You got to know a pump and motor with the shortest shaft distance between the pump and impeller is the safest.

If these Energy and the NRC were professional they would have set up a mockup of the service water pumps and then taken all the data and parameters they needed. Instrument up everything!

What the heck is "bumping the pump", and how many times do they do it? " Does everyone else do it?

Root Cause Evaluation Report  
Service Water Pump 7-C Line Shaft Coupling Failure  
CR-PLP-2011-03902, EVENT DATE: 08-09-2011

Based on the FEA analysis, the in situ tensile stresses and a description of the actions taken to "snug" the shafts during installation, it was determined that Palisades practice of "bumping" the pump to tighten the shafts was not a likely contributor to the failures in September 2009 and August 2011.

You would think you'd want these coupling torqued with a good torque wrench. This is a nuclear power plant but sounds like a broke and low paid employee paper mill. How much torque does it take to unscrew a bumped coupling...what the quality of a accurate torque with a nuclear service water safety pump? Can't you see them starting the pumps up on a loose coupling, the motor immediately gains a lot of speed without the inertia of the heavy metal below it...the impeller stays still for a fraction of a second. Then bang, the coupling runs out of threads and finally overcomes inertia...with the coupling over tightened. You would think the coupling and the shafts would become more structurally stronger and larger depending on how much inertia and rotational weight they carried going up the length of shaft towards the motor? They look all the same size to me?

I think with the bushings the long shaft wobbles...again deformation with the coupling and shaft, and leads to stresses and IGSCC

The Palisades service water pumps are defective. The shafts, couplings and their threads are way undersized, the shafts too long for the duty they are undergoing. I wonder nation wide what are the lengths of the service water motor to impellor length...are there any damage or maintenance issues with a pump and impeller shaft being too long? Is the Palisades service water pump and impeller shaft longer than most of the other plant. Again, any association with troubles with shaft length. The Palisades service water pumps are defective and dangerous. I request that the Palisades plant remain shutdown or shutdown until new service water pumps are installed.

Finally, we need to talk about the standards of certainty I need and then what the NRC finds acceptable from Entergy. As a outsider whistleblower, I need impossible to get absolute and triplicate evidence and proof about a concern I have. Even in safety related discussions, the standard of engineering certainty in the nuclear industry is "not a likely contributor". Why the difference for the NRC with uncertainty and weasely words and standards between me and a nuclear plant engineer? I bet you the lawyers love that get out of jail word definition. Anyone got a list of engineering and NRC with definitions... what the hell does "a likely" mean?

...It was determined that Palisades practice of "bumping" the pump to tighten the shafts was *not a likely contributor* to the failures in September 2009 and August 2011.

### Emergence of Systemic Meltdown of Entergy

Yesterday, the NRC disclosed a \$140,000 fine for River Bend with the "at the controls" licensed plant control room operator's knowingly violating procedures and going on the internet at a nuclear power plant. What really displeased the NRC was the failure of Entergy to fully investigate the incidences and correct it. Recently the NRC disclosed a licensed operator stormed out of the Palisades control room of the plant over a conflict with other employees without notifying his management. By the way, the NRC and Entergy never discuss if employee/management relations are ruptured. What really cause employee conflicts that almost ended up as violence in the control room of a nuclear power plant.

Gets me to wondering if the widespread employee culture survey coming out of the Palisades security falsification was accurate and a falsification on top of another falsification.

From River Bend, don't forget River Bend's issue with QA/QC national issues and intimidating an engineer over a safety related concern, to Pilgrim's start up overpower trip by not following procedures and control room distractions during the startup and the horrid repeated problems with Palisades shutdowns, trips, down powers and special investigating...Entergy fleet nation wide has had a tremendous amount of fleet training about doing the right thing and following procedures in the last year and nothing works. All that fleet training about doing the right thing and following procedures was for nothing and it is getting worst.

I need to make a comment about corporate, personal and individual privacy issues. A lot of these investigation...the resultant media attention, punishments and corrections have been delayed for years over privacy issues. The rights of culprit who don't follow procedures, those who lie and cheat, the rights of those knowingly don't follow procedures or have crappy procedures take precedence over the rights of a community to have an orderly and well behaved plant. We know the NRC and nuclear industry is using privacy issue...the ADR process...using privacy issues to massively delay and dilute plant accountability and individual punishment and create unnecessary secrecy. Delayed Justice and Justice behind closed door to the community around a nuclear plant is no justice at all. Why doesn't a communities rights of knowing what is going on come first instead of a miscreants won't follow codes of conduct, codes and rules.

I don't think coming into the nuclear industry gives them a total refuge of no public or personal accountability and all their sins will remain hidden. I think all nuclear employs should dedicate their live too transparacy and openness...and their personal lives and especially their at work lives should be scrutinizes more that everyone else's. This fixation with employee privacy issues exspeccailly by the NRC is allowing these nuclear facilities to get away with murder. Can't you hear all these NRC officials, we all disservices special privacy issues because we get the big bucks and its our special privilege to be different than anyone else and to be protected more than the pitiful normal poor people.

Massive backlog of procedure up dates, plant maintenance and technical updates

Entergy Fukushima DC power Plant Trip Root Cause dated 11/17/2011:

...“Prior to the 2010 refueling outage 1R21, routine preventive maintenance performed per work order WO52025543-01 identified that the green status indication lights for the containment escape air lock MZ-50 were not working. Although CR-PLP-2010-3580 and work request WR210717 were issued at the time, this condition was not addressed until the troubleshooting activities scheduled for Thursday 09/22/11 under WO248834-01.”

... “During this coordination meeting it was determined that mechanical work associated with Containment Escape Hatch MZ-50 would be scheduled for early Monday 09/26/11.”

Man, what kind backlog of maintenance do they have, where they have this inoperative green light powered from the DC emergency power system prior to the Oct 2010. They are talking about a year before they discover it was broken and repairing it. Is this the competency and excellence you would expect out of a great nuclear plant and nuclear organization. This maintenance delay of a year, the computer processes that creates it, or hid it from repair, or not enough Entergy resouces to get maintenance done in a timely and safe shutdown manner. The organizational chaos and blindness of a year or more that created or triggered the long journey towards the DC emergency power system short and plant trip. I don't see anything about this in tomorrows Entergy's presentation and the whole of Entergy's root cause analysis or the prior NRC inspection activities.

They don't begin to trouble shoot it until Sept 2011 and how many shutdown have they had to fix it. Their work prioritization system is all screwed up and everyone knows it...can't distinguish between a safety system and everything else. I bet you they got so many backed up work orders it buries their document system. Bet you if they documented the escapee hatch light as you can't startup if it is not fixed, it would have been fixed right away or decades ago? Didn't they have issues in the past with the airlock mechanism jamming and almost killing employees? It is kind of evasive where they speak in "prior to 2010", how much prior to Oct 2010?

As a note, it looks like the DC panel wasn't designed to be entered with a energized panel, and especially up at power. How many more panels and components do they do major work on when they are energized and up a power that is specifically not designed for this kind of work. A properly designed panel would be a lot more spacious for the breakers and bus work inside...the side, back and front outside panels would be completely removable. Access to all components would be easy. The panel would be in the open on all sides...with plenty of distance from other obstructions and panels where people could gain easy access to all sides. There are doing stuff on these components that wasn't designed for the purpose, or thought of in the beginning. That is a grave engineering sin.

Disgusting, an abandonment by senior management to good employees. They fired a license operator for leaving the plant without permission...so when are these senior managers going to get fired for doing worst? I get it, fired the little guys and make a big deal over their sins. But the big senior managers who make the really big bucks and got the power to know and correct problems always get a free ride. You know, senior nuclear plant managers and senior NRC officials got to sick together in their little Glee Club?

"Senior leaders do not consistently exhibit a bias for action when addressing organizational issues. For example, senior leaders had seen indications of weakness in managers' support of the duty team during the forced outage earlier in the month, but they did not take action to ensure that the necessary levels of support were provided over the weekend of the event."

#### Generic Implications - Extent of Condition/Extent of Cause

A review of Maintenance Emergency Power System procedures found that, even though these procedures have been in use, six of the twelve current procedures have not been *revised since 2007* when the plant was part of NMC. With respect to this situation, the more current DC breaker procedure EPS-E-12 includes requirements for breaker bolt

torquing and the use the EN-IS-125 electrical safety checklist. Corrective actions have been assigned to review and revise these procedures.

Currently, more than *400 change requests* exist for the Permanent Maintenance procedures. Based on the number of severely outdated EPS system procedures, the status of Maintenance procedures for other systems could also be at risk.

This has been affected by the willingness of Maintenance workers, as in this case, to continue to use inadequate work instructions. Corrective actions are assigned to identify and correct these procedures and to establish a method for regular update review.

I mean, come on, Fukushima Daiichi Emergency Power System procedures. I'd like to ask the question if the other DC side failed when this trip happened and no DC? With the plant and Entergy bungling over so many issues in the last few years...to me it is highly plausible the other side might have had a defect it in. Over the all NRC inspection reports in the last year and all the issues discovered so far by Entergy this year...can you even imagine all the bad procedures, missing maintenance and senior management inattention. Can you imagine the Fukushima chaos and disorder they would have had at the plant if they had a total loss of DC accident or similar accident in this past Sept. Anyone can operate a power plant at power with no problems, but it is a completely different world when the plant goes to shit.

I request the Palisades plant remain shutdown or the NRC shuts them down. I request all Fukushima Emergency Power System (EPS) procedures, all other plant procedures of all kinds and all backlogged maintenance be fully completed before start-up. All technical updates what so ever be completed. I request all training and schooling for any employees become completely updated.

### The Nuclear Regularly Commission

I consider the recent events of the four NRC commissioners and headhunting of chairman Jazcko as a severe intimidation to all the NRC employees and the all the employees in the nuclear industry. I think a lot of the employees think the nuclear industry can buy the four NRC commissioners to go head hunting for the chairman who is perceived to be coming from the democrat side of the aisle. If you are not in our group, the regular boys know the executives and official we can lop off any head. I think all the employees in

the industry fear the penny profit and highly paid bonus centric mongrels at the head of the nuclear and electric industry. I requested a independent wide survey of NRC employee's feelings about trying to take out the chairman, and throughout the industry.... about the head hunting in the NRC commissioners office that has recently occurred. Is anyone in the industry intimidated about raising safety and what do the professionals think about this? The region III PR people don't seem to be interested in this. They are too chicken to bring up my issue to the Washington DC NRC.

I consider recent events at Browns Ferry post red finding, at Entergy and post accident...all recent event investigation at a lot of plants in the nuclear industry as very disturbing and troubling. A tremendous amount of NRC violations and engineering safety shortcomings are discoverers through playing the gambling slot machine of a accident or a surprising unexpected operation or mis-operation of a safety component, person group or organizational. Why isn't Reactor Oversight Program catching these violations and engineering shortcoming...why isn't ROP picking these up and making a plant or nuclear corporation become a good citizen. Why is rare that we never get a severe plant accident or employee screw-up, without a slew of NRC findings with secret hidden violation, some for decades. Why no clean accident or event without secret hidden violations? I believe if a organization seen all their secret unseen violation through a comprehensive NRC inspection, it would make a plant like Palisades, River Bend and Vermont Yankee a better corporate citizen.

I am telling you, we got a runaway petroleum well in another Gulf of Mexico and it riddled with weak regulation and government oversight ...massive secret non disclosed violations and really poor safety engineering! I believe the NRC are in agreement with these plants, in that large numbers of secret violations don't matter. I estimate that only a third to a half of all NRC and corporate violations are discovered in a timely manner and reported in a inspection report...not uncovered in the worthless Reactor Oversight Process.

If the NRC and a nuclear company has a agreement that certain violations can remain secret...you then need a enforcement system and enforcer employees who make good employees keep secrets from the public. Secret accepted NRC violations without full public disclosures are a gave threat to the culture of the NRC and any nuclear plant safety culture. Great nuclear secret violation enforcer employees are usually poor safety employee...while good safety employees usually get poor employee evaluation in this system. Guess who get promoted to the big bucks?

NRC Special Inspection On The Fukushima Emergency Power system

This is symbolic of the do-nothing and nothing-ever-matters risk regulation NRC. They cleave to the safety of always writing a report after a serious event, but never have the guts preemptively stop a accident. The life of a licensed operator up in these nuclear control rooms depends on them sizing up the conditions around them and acting correctly on fragmentary not complete information at a moments notice. The most important things up there is judgment, to preemptively act on emerging problems before they get big. Think about it, if the NRC inspectors were in a control room of a domestic nuclear plant... and the corporation and employees were brazenly acting crazy threatening an impending core meltdown...would the inspectors have the stones to demand a stop work order or request a immediate scam of a plant? I know the government officials would be thinking the safe thing to do is write a report once the nuclear cloud dust settles. They can never fault me for writing a report.

The NRC should have been extremely intrusive with watching over this DC Emergency Power System incident. The agency is as bad as the Palisades root cause team on identifying the lack of enthusiasm with senior Palisades managers. The NRC resident inspectors should have gotten word and keeping up to date with the EPS travails leading up to the erratic control room indications two days before the DC short. Two days before the Emergency Power System short and plant trip, the inspectors should have demanded an immediate stop work order and required a immediate scam on the first Fukushima Emergency Power system short.. Certainly when word of the arc marks on the bus work became known...that should have tripped the NRC into immediate action. When was the last time you ever heard the NRC demand a immediate stop work order or demand a plant trip? These guys are too chicken to do their jobs. The NRC should have known the Palisades senior manager didn't have their stuff in the right sock, they were confused and missing in action...the NRC should have without the erratic control room instrumentation indication and arc mark on the bus work, should have demanded a stop work order based on the Entergy system being in a state of incompetency.

We pay these officials big bucks and they say in surveys the NRC gives them a happy work inviroment at the agency...we should demand these officials be very intrusive at a troubled plant and never have any fear with jumping in the arena of demanding a stop work or plant safety scam.

This NRC's Sept 23, 2011 in real time failure to "perceive organizational dysfunction" and then "failure to act" on a grossly unsafe repair of a Emergency Power System is a grave symbol of NRC, as a whole, that collectively the agency is too systemically weak and fearful to preemptively "step into a plant" and force a plant safe into being safe.

The NRC is there to take the punch bowl away from a drunk, blind and chaotic staff of any nuclear power plant...that threatens our nation and the nuclear industry.

"These electrical losses resulted in a reactor and turbine trip at approximately 3:06 p.m. on September 25, 2011"....

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Description: On Friday, September 23, 2011, the licensee performed troubleshooting and replacement of DC Breaker 72-123 on Panel D11-2 due to the loss of indication lights for Door MZ-50, the emergency airlock. During maintenance restoration of the FME barrier for Panel D11-2 (a metal strip down the center of the panel), control room alarms were received for the TG voltage regulator, generator over-excitation, and a loss of indication for multiple containment isolation valves. In addition, a loss of normal instrument air was experienced in the plant. Troubleshooting performed by electricians Friday night and early Saturday morning identified a 1/16-inch gap between the Panel D11-2 positive horizontal bus stab and the contacts on Breaker 72-119, which could cause the intermittent power loss to the breakers in Panel D11-2

Fed 22, 2011

*"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?"*

Jan 10, 2010

Request Palisades nuclear power plant and all Entergy nuclear power plants be immediately shutdown.

- 1) Request top Palisades Management staff be fired and replaced before startup.
- 2) Request Entergy's corporate nuclear senior staff be fired and replaced before the restart of the plants.
- 3) **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.

- 4) Request the formation of a local public oversight panel around every plant.
- 5) Request a emergency NRC senior official oversight panel with the aims of reforming the ROP.
- 6) 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.
- 7) 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.
- 8) Request a evaluation if NRC region III has enough personnel and resources.
- 9) Request Palisades to stay shutdown or remain shutdown until the replacement of the three service water pumps.
- 10) Stay shutdown or remain shutdown until all procedures are fully updated and corrected, all technical and maintenances backlogs are updated and corrected, all training completed, all reports and safety processes fully completed and implemented.
- 11) Request a report by the NRC on why the region III NRC failed to stop work and demand a reactor scram of Palisades prior to the electrical short and plant trip with the DC "emergency power system".
- 12) Doesn't it drive you data driven nuts crazy...the system doesn't force all the utilities to report all coupling failures, degradations and near misses. Request the NRC fix this problem!
- 13) I request that President Obama fire Chairman Jazcko and the other Four Horsemen of the Apocalypse Commissioners!
- 14) Request a independent outside investigation over the insufficient process outcome of the 2008-2009 Palisades security falsification, investigation, safety survey local and fleet wide training and safety surveys. Based on the DC root cause it appears the safety culture for many years has been grossly defective and ineffective, along with the ROP...with then all these processes failing to discover the true depth of Entergy's safety cultural problems and they lied about these processes fixing Entergy. It sounds like this is a generic problem to me.

We are broadly are worried about in 2009 over the Palisades security falsification, in the outcome of the violations, whether all the reports and employee cultural surveys with the assortment of NRC and Entergy processes over this very serious violation, ever had any meaning at all. According to the Palisades Fukushima Emergency Power System DC short

and plant trip, the most recent root cause Entergy admits there is deep and widespread safety cultural problems at the Palisades plant. I feel Palisades safety culture was in the pits in 2009 and before...and the cultural safety survey was a grand Entergy and NRC falsification. The NRC Alternate Dispute Resolution secession over this, the Confirmatory Order, the Entergy investigative reports and safety cultural survey, the willing acceptance of this insanity by the NRC, Entergy and the NRC created the inaccurate falsified impression to the outsiders that Entergy had discovered all the cultural safety problems and corrected them. Nothing could be farther from the truth, all these corporate and agency processes covered up and deepened, took the public's eyes off fixing Entergy...where Entergy now is in much worst condition than they were then. I request independent outside investigation on this dangerous agency corruption before Palisades start-up.

#### CONFIRMATORY ORDER

Sincerely,

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## **GMP, CVPS file lawsuit against VY over tower collapse**

**BRATTLEBORO** - Vermont's two largest utility distributors have filed a lawsuit against Vermont Yankee's parent company, Entergy, in Vermont Superior Court in Windham County.

Green Mountain Power and Central Vermont Public Service have filed a joint lawsuit over costs resulting from the plant's failed cooling tower in 2007 and 2008.

"This case arises out of Entergy's breach of its contractual obligation to us 'Good Utility Practice' in its management and operation of the Vermont Yankee Nuclear Station," the companies stated in a joint statement this morning.