

OFFICE OF THE SECRETARY  
CORRESPONDENCE CONTROL TICKET

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**PAPER NUMBER:** LTR-13-0185 **LOGGING DATE:** 03/01/2013

**ACTION OFFICE:** EDO

**AUTHOR:** Tom Gurdziel

**AFFILIATION:**

**ADDRESSEE:** Chairman Resource

**SUBJECT:** Concerns NRC Meeting on San Onofre Nuclear Generating Station RAIs, held 2-27-13

**ACTION:** Appropriate

**DISTRIBUTION:** Chrm, Comrs, SECY to Ack.

**LETTER DATE:** 02/27/2013

**ACKNOWLEDGED:** Yes

**SPECIAL HANDLING:** Lead office to publicly release 24 hours after SECY's assignment, via SECY/EDO/DPC.

**NOTES:** 2 e-mails

**FILE LOCATION:** ADAMS

**DATE DUE:** **DATE SIGNED:**

To: Leeds, NRR  
cys: OEDO  
RIV  
Merzke, OEDO

**Remsburg, Kristy**

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**From:** Tom Gurdziel [tgurdziel@twcny.rr.com]  
**Sent:** Wednesday, February 27, 2013 3:57 PM  
**To:** CHAIRMAN Resource  
**Cc:** newal; thenry; ipenn@tampabay.com; Screnci, Diane; Bridget Frymire; Uldis Vanags; P Kaiser; T Holden; Jill Lyon; ESTRONSKI@aol.com  
**Subject:** NRC Meeting on SONGS RAIs, held today (2-27-2013)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello,

I took off a half a day of work to hear this meeting and was quite disappointed in it. It was very apparent that the NRC personnel at the table were NOT PREPARED. It was encouraging to see that the SONGS people did appear prepared to answer NRC questions. So, it cost me 4 hours. Can you think of how much it cost to fly those SONGS people to the East Coast just to read slides saying what they were going to provide for RAI 33 to RAI 67 and not be able to clarify any additional response needs?

The matter of RAI 1 to 32 is, perhaps the best word is, infuriating. You had a chance to at least determine that you had received what you wanted but, since nobody (at the NRC) can distribute slides until THE MORNING OF THE MEETING to higher level NRC people sitting at the table, there was just silence when RAI 2 was brought up. Then silence again for RAI 3. (You can check the meeting yourself if it is recorded: the time would have been at about 47 minutes.)

Unfortunately, as I see it, the NRC has repositioned itself from being a REGULATOR tasked with keeping the public safe to doing advanced (steam generator) design review instead. So, the major apparent (SONGS related) activity of the NRC now seems to be seeing how many more (time consuming) questions it can ask.

So, let me ask you: why are your questions not about what failures can happen that would threaten the public? Like:

How can a replacement pair of steam generators fail, (and endanger the public)?

Are monitoring instruments able to identify failure quickly enough?

Can isolation or containment mechanisms operate (reliably) quickly enough so that radiation released to the public is at or below Federal limits?

Because, if the (reasonably) predictable failures do not exceed Federal guidelines, then the review work of the NRC is done!

Now, I want to recommend a course of action. Since the NRC does announce, from time to time that they have the power to modify licenses, even to zero reactor power, I think it would be appropriate for the NRC to modify the San Onofre Nuclear Station Unit 2 plant to 70% of what is presently maximum reactor power. That becomes full licensed power and that should stop a lot of useless, costly, and time-consuming dancing around.

Next, all 5 Commissioners need to instruct NRC Staff that, in the real world, decisions sometimes need to be made using "engineering judgement" even (or especially) when all possible (requestable) information is not at hand.

Finally, make a decision.

Thank you,

Thomas Gurdziel  
Member, ASME

It might be time to review the NRC-licensed power level of Duke/Progress/Crystal River 3 as well.

**Remsburg, Kristy**

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**From:** Tom Gurdziel [tgurdziel@twcny.rr.com]  
**Sent:** Wednesday, February 27, 2013 10:06 PM  
**To:** CHAIRMAN Resource  
**Cc:** newal; thenry; ipenn@tampabay.com; Screnci, Diane; Bridget Frymire; Uldis Vanags; P Kaiser; T Holden; Jill Lyon; ESTRONSKI@aol.com  
**Subject:** 2-27-2013 NRC Meeting on SONGS RAIs

**Follow Up Flag:** Follow up  
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Hello,

During today's meeting, it appeared to me that an NRC person attempted to "encourage" the SONGS plant representatives to commit to a bunch of R & D work with the Loose Parts Monitoring System on the replacement steam generators. If you read page 9 of the AIT Follow-up Report, you will find it reported that "no performance deficiency existed". So why would that be? If there is no problem, why is it necessary to do a lot more study?

Actually, it appears that the reason is that there IS an actual performance deficiency. Or, at least, I think that 30 valid alarms in about one year is a problem...especially if "the licensee appropriately responded to the alarms" .."in accordance with alarm response procedures and vendor recommendations", yet the best they could do on identifying the source of the alarms was to call it "inconclusive".

Can you tell me how you can appropriately respond to an alarm if you don't even know what caused it (30 times)?

My observation is this. The (PWR) Loose Parts Monitoring System does not work. I think it should be the responsibility of the NRC to determine if any installed loose parts monitoring system on any (US) PWR works, or are they just something impressive to talk about? This problem should not be assigned solely to SONGS.

Thank you,

Tom Gurdziel