

Joosten, Sandy

From: Tom Gurdziel [tgurdziel@twcny.rr.com]
Sent: Monday, May 27, 2013 10:59 PM
To: CHAIRMAN Resource
Cc: jicc; Uldis Vanags; Bridget Frymire; thenry; OPA4 Resource
Subject: Arrival Eddy Current Testing at SONGS
Attachments: CPUC 5.docx

Good morning,

I hope to mail this letter early this week.

Thank you,

Tom Gurdziel

9 Twin Orchard Drive
Oswego, NY 13126
May 27, 2013

President Michael R. Peevey
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear President Michael R. Peevey:

Isn't it too bad that they ruined (or at least damaged) those expensive replacement steam generators at SONGS by operating them with those inadequately designed Anti Vibration Bars? Wait. Let's just pause here a minute. Anybody working in the nuclear industry longer than 6 months would have heard the advice to have a "questioning attitude."

So, let's use our "questioning attitude" now. First off, if the anti-vibration bars, (AVBs) caused the damage during plant operation, wouldn't the replacement steam generators have been undamaged before the start of operation? How can we prove this? Fortunately, we can see from the very top of page 4 of the NRC Augmented Inspection Team Report 05000361/2012007 and 05000362/2012007 that an eddy current test was done in Japan and was done at SONGS on the Unit 2 steam generators. And, a statement is made that no changes were identified.

Well, this sounds good. However, I cannot see any mention in the attached List of Documents Reviewed that the NRC team actually looked at these eddy current tests. (There is mention of eddy current tests of the U-bend portion during manufacture. They are mentioned on pages 4 and 5 of the attachment to NRC Augmented Inspection Team Follow-up Report 05000361/2012010 and 05000362/2012010. I would not conclude these are the same tests, though they may be.)

That was for Unit 2, the one that did not have a tube break. What about Unit 3? Well, go to the bottom 2 paragraphs of page 4 of the AIT Report, (not the AIT Follow-up Report). See if you can find any reference to the fact that they did an eddy current test on the Unit 3 replacement steam generators at SONGS. I don't think you will see it. So, how can you blame the AVBs for causing damage to what have been assumed to be undamaged tubes, when you cannot show that the tubes were undamaged at the start of Unit 3 operation?

Thank you,

Tom Gurdziel
Member, ASME

(Please note that, in my first sentence, I have "jumped to cause." The common advice when doing problem solving is to NEVER jump to cause.)

Copy:

Commissioner Catherine J.K. Sandoval

Commissioner Mark J. Ferron

Commissioner Mike Florio

Commissioner Carla J. Peterman