

From: Inverso, Tara  
To: Marv Lewis  
Cc:

Sent: Fri 6/14/2013 8:09 AM

Subject: RE: Difference between paperwork and reality. COMMENTS ON CUMULATIVE EFFECT OF RULEMAKING.

Dear. Mr. Lewis,

Thank you for your interest in the Cumulative Effects of Regulation (CER) at the U.S. Nuclear Regulatory Commission (NRC). I received your e-mail dated June 12, 2013, and entered it into the NRC's official record system (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13163A281). Your comment is also posted to [www.regulations.gov](http://www.regulations.gov) under Docket ID NRC-2013-0102. The NRC staff will consider your comment as it continues to address CER.

Thank you,

Tara Inverso

-----Original Message-----

From: Marv Lewis [<mailto:marvlewis@juno.com>]

Sent: Wednesday, June 12, 2013 9:13 AM

To: Inverso, Tara

Subject: Difference between paperwork and reality. COMMENTS ON CUMULATIVE EFFECT OF RULEMAKING.

Dear Ms Inverso,

Thank you for the help that you gave me in getting a comment into the CER talks as rulemaking has not been started. Please file this letter as my comments to date on this CER action or rulemaking.

As far as I can discern or figure out, NRC and licensees believe that filing a piece of paper is the same or equivalent to actually doing the deed associated with that piece of paper.

Actually the truth maybe very different. One example is the commitment that ALJ Smith stated the Licensee made in the Findings of Fact and Conclusions of Law in the matter of the Restart of TMI#1, Lewis Contention on Filters. The Licensee committed to adding or upgrading filters on TMI#1 before restart. I personally saw that a filter was made and loaded on a truck to go to TMI, but I could not get free to make sure of installation. I saw it loaded at Red Lion and Global in Philadelphia, but did not see the upgrade on Three Mile Island. I have since attempted to find out about the filters on TMI with negative results. Seeing that I have been attempting to verify a filter on TMI#1 since 1979, I am not assured that a piece of paper would suffice at this time in 2013.

Another example of paperwork not reflecting reality is the recent disaster in Philadelphia wherein a building fell and killed several people. Somehow the paperwork doesn't reflect reality.

I hope that I am getting the idea across that paperwork should reflect reality as I did not hear that concern at the phone conference or in the paperwork so far sent about CER.

Respectfully submitted,

Marvin Lewis, R. P. E. (Retired)

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