

## NRR-PMDAPEm Resource

---

**From:** Michael Mulligan [steamshovel2002@yahoo.com]  
**Sent:** Monday, March 31, 2014 5:07 PM  
**To:** Chawla, Mahesh  
**Subject:** Re: Palisades 2.206 Petition - OEDO-14-00145 - MF3608

'Leading a Safety Culture'

<https://drive.google.com/file/d/0B4jsoP11ekEnWEhTa1RsTnZSUWs/edit?usp=sharing>

He should write one for how a federal regulator leads a Safety culture.

On Monday, March 31, 2014 4:22 PM, Michael Mulligan <steamshovel2002@yahoo.com> wrote:

Mr. Chawla

Why is the agency withholding the timeframe when the blade broke off the impeller? What is so secretive about that?

That certainly sounds like a cover-up?

Maybe too embarrassing for everyone to disclose?

So why can't we see this report?

"The licensee's evaluation and analysis provided the NRC with sufficient basis to conclude that the impeller piece will not impact the reactor vessel or the fuel within the vessel," according to the result of the review reported Monday."

On Monday, March 31, 2014 2:15 PM, "Chawla, Mahesh" <Mahesh.Chawla@nrc.gov> wrote:  
Mr. Mulligan,

Here are the two media articles which you may be referring to. Thanks

This article references the licensee's evaluation and analysis:

[http://www.mlive.com/news/kalamazoo/index.ssf/2014/03/broken\\_piece\\_of\\_metal\\_in\\_palis.html](http://www.mlive.com/news/kalamazoo/index.ssf/2014/03/broken_piece_of_metal_in_palis.html)

This article says we asked them to submit a safety analysis before starting up:

[http://www.heraldpalladium.com/news/local/stray-metal-puzzles-palisades/article\\_816d65dc-6413-510a-803d-c823b5b40139.html?mode=story](http://www.heraldpalladium.com/news/local/stray-metal-puzzles-palisades/article_816d65dc-6413-510a-803d-c823b5b40139.html?mode=story)

---

**From:** Michael Mulligan [mailto:steamshovel2002@yahoo.com]  
**Sent:** Monday, March 31, 2014 12:41 PM  
**To:** Chawla, Mahesh  
**Subject:** Re: Palisades 2.206 Petition - OEDO-14-00145 - MF3608

Thanks,

I guess there is not going to be a answer to this. There seems to a report about the empeller damage somewhere spoken in the media...can i get a copy of it?

Mike

On Monday, March 24, 2014 1:38 PM, Michael Mulligan <[steamshovel2002@yahoo.com](mailto:steamshovel2002@yahoo.com)> wrote:

Mr. Chawla,

What about speaking to the experts?

But thanks.

Mike

On Monday, March 24, 2014 1:14 PM, "Chawla, Mahesh" <[Mahesh.Chawla@nrc.gov](mailto:Mahesh.Chawla@nrc.gov)> wrote:  
Mr. Mulligan,

We are checking the availability of the PRB and will inform you when we can conduct a call with PRB. In the meantime, I am attaching a copy of the Management Directive 8.11 for your reference. Thanks

---

**From:** Michael Mulligan [<mailto:steamshovel2002@yahoo.com>]  
**Sent:** Friday, March 21, 2014 11:37 AM  
**To:** Chawla, Mahesh  
**Subject:** Re: Palisades 2.206 Petition - OEDO-14-00145 - MF3608

Mr. Chawla,

I don't agree with the agency's decision on the impeller. I'd like to speak to the PRB by telephone please.

But, good job on the CRDMs!

Can i speak to agency experts about the Palisades PCP broken impellers...can they be "up" on the history of PCP impeller damage at Palisades and the industry?

I am waiting to see the NRC PCP impeller report concerning this on Adams...what is your proof that it is safe? I am particularly interested in IN 85-03.

Thank you,

Mike

On Wednesday, March 19, 2014 1:33 PM, "Chawla, Mahesh" <[Mahesh.Chawla@nrc.gov](mailto:Mahesh.Chawla@nrc.gov)> wrote:  
Mr. Mulligan,

I have been assigned as the Petition Manager for the 10 Code of Federal Regulations (CFR) 2.206 petition, you submitted to the Nuclear Regulatory Commission (NRC) on March 5, 2014, regarding your concerns about various issues related to equipment failures and operations at Palisades Nuclear Plant (Palisades). You also expressed concerns with NRC inspection activities and the NRC's reactor oversight process.

Section 2.206 of Title 10 of the *Code of Federal Regulations* describes the petition process – the primary mechanism for the public to request enforcement action by the NRC in a public process. This process permits anyone to petition NRC to take enforcement-type action related to NRC licensees or licensed activities. Depending on the results of its evaluation, NRC could modify, suspend or revoke an NRC-issued license or take any other appropriate enforcement action to resolve a problem. The NRC staff's guidance for the disposition of 2.206 petition requests can be found in NRC Management Directive 8.11, which is publicly available.

Because you specifically requested in your letter that the NRC take different enforcement actions as described in your petition, including your request for **immediate actions** to prevent the Palisades plant from restarting (i.e., Items #6 and #10 in your letter), your request was referred to the 2.206 process. The 2.206 process is separate from the allegations process; the latter which affords individuals who raise safety concerns a degree of protection of their identity. In the 2.206 process, all of the information in your letter will be made public, including your identity.

On March 14, 2014, your request for immediate action to prevent Palisades restart was reviewed by the members of the Petition Review Board (PRB), which includes staff from the NRC's Office of Nuclear Reactor Regulation (NRR), staff from Region III, and the NRC resident inspectors at Palisades. After thorough review and discussions, the PRB reached a general consensus that there were no safety significant concerns to prevent the plant from restarting as scheduled.

The NRC has reviewed the licensee's evaluation of the impeller piece fragment within the reactor vessel and concluded that it does not pose a threat to the reactor and other plant components. Additionally, the licensee replaced all of the 45 Control Rod Drive Mechanism (CRDM) housings prior to plant startup. Please see NRC ADAMS document ML14073A612.

Based on the review of the licensee's evaluation related to the stuck impeller piece and replacement of all CRDM housings during the refueling outage, there were no safety significant concerns to prevent the plant from restarting as scheduled. Your request for the immediate action of shutdown of Palisades and other Entergy Plants did not have the adequate bases.

In accordance with NRC Management Directive 8.11 (which I have attached for your reference), you have the opportunity to address the NRC PRB to further discuss your petition, either in person at the NRC Headquarters in Rockville, Maryland, or by telephone conference.

Please advise me by March 25, 2014, and confirm your agreement with NRC's processing of your request under the 2.206 process. In addition, please advise me if you would like to address the PRB. If you would like to meet in person, I will need to schedule a formal public meeting at the NRC Headquarters. If you would prefer to address the PRB via telephone, I will also work with you to coordinate a date/time during the upcoming weeks.

If I do not hear from you by March 25, 2014, the PRB will meet internally to make an initial recommendation, after which we will offer you a second opportunity to address the PRB prior to our issuing a letter accepting or rejecting the petition.

Thank you,

Mahesh (Mac) Chawla  
Petition Manager  
U.S. Nuclear Regulatory Commission  
NRR/DORL/LPL3-1  
Phone: 301-415-8371  
Fax: 301-415-1222  
[mahesh.chawla@nrc.gov](mailto:mahesh.chawla@nrc.gov)



**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 1198

**Mail Envelope Properties** (1396300019.11831.YahooMailNeo)

**Subject:** Re: Palisades 2.206 Petition - OEDO-14-00145 - MF3608  
**Sent Date:** 3/31/2014 5:06:59 PM  
**Received Date:** 3/31/2014 5:09:58 PM  
**From:** Michael Mulligan

**Created By:** steamshovel2002@yahoo.com

**Recipients:**  
"Chawla, Mahesh" <Mahesh.Chawla@nrc.gov>  
Tracking Status: None

**Post Office:** web141103.mail.bf1.yahoo.com

Files	Size	Date & Time
MESSAGE	7171	3/31/2014 5:09:58 PM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**