

Joosten, Sandy

From: Tom Gurdziel <tgurdziel@twcny.rr.com>
Sent: Monday, May 26, 2014 10:56 PM
To: CHAIRMAN Resource
Cc: Screnci, Diane; thenry; T Holden; Lyon, Jill:(NMP); ESTRONSKI@aol.com; Bridget Frymire; rich@oswegocounty.com; Barclaw
Subject: An Urgent Matter
Attachments: Emergency Director.docx

Good morning,

Besides the shortcomings pointed out in the attached letter, we haven't done anything on other (non-initiating event) issues such as adequate operating crew size, or shift command and control, or combined control rooms, all of which appear to have been a problem at the Tokyo Electric Power Company's Fukushima Daiichi plant.

Thank you

Tom Gurdziel

9 Twin Orchard Drive
Oswego, NY 13126
May 26, 2014

Chairman Allison M. Macfarlane
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Chairman Macfarlane:

An Urgent Matter

I believe there is a matter before us more urgent than any one of the current Tier 1 Fukushima Near Term Lessons Learned activities. It concerns "Command and Control" of a plant's emergency efforts. Specifically, I believe it is necessary that the US NRC now, immediately REQUIRE that all persons serving as the plant's Emergency Director have a (US NRC-issued) Senior Reactor Operator license, or maybe at least a certification, on each plant on site.

This would be another lesson learned from the activities of the Tokyo Electric Power Company. My reference is the May 23, 2014 article: "Fukushima plant chief admitted mishandling of reactor cooling system" in the Asahi Simbun newspaper. If you read it, you will note that the person in the Emergency Director role did not understand the requirements of the emergency (isolation) condenser system. This would be particularly disturbing to a reader who might know that the emergency condenser system could be, (and has been), configured as a passive system. (This was NOT DONE in Japan.) Further, a person reading the article might note that the reason given for the lack of complete knowledge of the (safety-related) emergency condenser system was that it had not been run in about 20 years!

(Let me just stop here and mention that it is very hard for me to see the value of peer-type-inspections, (IAEA, WANO, and others?) when apparently no one noticed that safety-related systems were not getting tested periodically, or at least, no one said anything effective about it.)

So, a problem that I see here is that TEPCO assumed that the higher a person was in the organization, the more knowledgeable he was. The solution for us in the US, as I see it, is to obtain competence in the Emergency Director position by requiring the rigorous learning that may, (if successful), result in an SRO license.

Could I mention my assessment of cost – benefit? I would guess that two years of time to get a license would cost about ½ million US dollars. I would guess the cost of a person not knowing how his or her safety systems run would be about 1/3 of 135 billion dollars. So, I don't see a cost – benefit objection here.

The Absence of Redundancy

Isn't it somewhat startling that no useful advice was offered by the TEPCO Headquarters support groups, (or from anywhere else)? Or, was that advice available but not provided because of an unsuitable, (for nuclear generation), corporate culture?

Thank you,

Tom Gurdziel

Copy:

Commissioner Kristine L. Svinicki
Commissioner George Apostolakis
Commissioner William D. Magwood, IV
Commissioner William C. Ostendorff

Joosten, Sandy

From: Tom Gurdziel <tgurdziel@twcny.rr.com>
Sent: Friday, May 23, 2014 9:29 PM
To: CHAIRMAN Resource
Cc: Screnci, Diane; Cook, William; Mitchell, Matthew; Lyon, Jill:(NMP); T Holden; ESTRONSKI@aol.com; thenry; Bridget Frymire
Subject: Fukushima-related, 5-23-2014

Hello,

Fukushima plant chief admitted mishandling of reactor cooling system
<http://ajw.asahi.com/article/0311disaster/fukushima/AJ201405230034>

How many other BWR plants in Japan have isolation condensers and a senior management staff that does not know how to run them? (We called them Emergency Condensers at the plant I worked at.) When properly configured, they are passive systems.

I guess the basic question is this: how many plants, (PWR and BWR), in Japan have senior management that does not know how to run ALL their safety systems? Has NRA noticed? Has IAEA noticed?

I guess the next question is: how many nuclear plant safety systems in Japan get operated, (tested), once every twenty years or so?

Finally, (to Mike Johnson), is it apparent that, when the top guy doesn't know the right thing, nobody else speaks up?

Thank you,

Tom Gurdziel