

Feb 04, 2016

Victor M. McCree
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Runaway Main Steam Safety Valve (MSSV) Tech Spec lift Setting Failures at Indian Point since 2009.

Dear Mr. McCree,

Why is the NRC sleeping at the switch? I request a 2.206 petition at Indian Point.

Why has there been an astonishing increase in Main Steam Safety Valve Setpoint drift testing failures beginning in 2009? There seems to be none before 2009. Why did these failure begin in 2009...considering all corrective action and processes at the site. It continues today unabated. It is like they caught some mysterious disease and there is no cure. These valves being opened cool the core and control steam generator pressure.

Shearson Harris mysterious began having similar failures. Two valves fail in 2013 and in the most current LER five valves failed. They have a similar clean record before 2013. Why has this mysterious problem popped up from nowhere and the failure rate has been drastically increased as time goes on. Why can't these two plants get control of this problem?

There seems to be vibrations issues. An odd assortment of internal parts degradations seems to be the culprit. What new has changed in both these plants to cause the internal parts to fail? I am particularly irked by pressurizer safety internal coil or spring being stretched. It reminds of the test stand damage seen a Pilgrim before installation. It is known, when most of these guys fails lift setpoint and out of federal tolerance, they just adjust the setting to acceptable Tech Spec limits. They don't do any further inspection or proactive or preventative maintenance.

No doubt this in happens at many plants.

What is the concern to me the most, is there is no new "Information notices" on SRVs, MSSVs and pressurizer valves degradation or failure? We know the LERs really only capture-report on a small proportion of the valve problems. Your industry wide trends and information is not being kept up to date on these components. Your NRC notices are grossly out of date (most of them a decade out of date or more) on the components and these licensees are constantly referencing these grossly out of date notices in the current LERs.

You would think a nuclear plant having problems like this would go the market to get a better/reliable design and up to date components new. Is Indian Point have problems with component replacement and can they buy sufficient valve knew internals?

- 1) Request an immediate special inspection on the magnitude of the valves involved and the constant reoccurrence of these failures. These guys have constantly said in each LER the problem is solved. If they can't keep these valves operable, then both plants shouldn't be operating. I am sure NY state would agree with me.
- 2) Please create a new NRC Information notice on the failures of the valve and the organization.
- 3) I request Indian Point emediately eradicate any problems with their MSSV up to and including a shutdown. They are controlled by technical speciations.

The involved LERs at Indian Point below. Why did it start in 2009...what has changed?

LER 2015-002-01

LER 2012-003-02

LER 2012-005-01

LER 2011-004-00

LER 2010-002-00

LER 2009-002-00

Sincerely,

Mike Mulligan
Hinsdale, NH
16032094206
steamshovel2002@yahoo.com
cell 1-603-209-4206

From: [NRC Allegation](#)
To: [Wallace, Denise](#)
Cc: [Banic, Merrilee](#)
Subject: 2.206 Petition - MSSV failures at Indian Point
Date: Friday, February 05, 2016 3:40:42 PM
Attachments: [External_Sender_Indian_Point_MSSV_2.206.msg](#)
[External_Sender_Indian_Point_2.206_On_runaway_MSSV_set_pressure_testing_accuracy.msg](#)
[External_Sender_Indian_Point_2.206_On_runaway_MSSV_set_pressure_testing_accuracy_and_increasingly_degrading_internal_parts.msg](#)

Denise,

Per our conversation, the attached 2.206 petition addressed to the EDO was received in the NRC Allegation email box, so I am forwarding to the EDO for ticketing, as appropriate (NRR). An initial review indicates that the individual is requesting a special inspection of Main Steam Safety Valve (MSSV) setpoint drift testing failures at Indian Point and Shearon Harris. I am including the NRR 2.206 Coordinator for awareness.

Thanks,

Tamara D. Powell

Allegation Specialist
Office of Enforcement
301-415-5101
Office: O-4H14