

## CHAIRMAN Resource

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**From:** Tom Gurdziel <tgurdziel@twcny.rr.com>  
**Sent:** Sunday, July 10, 2016 9:39 PM  
**To:** CHAIRMAN Resource  
**Cc:** JNappi@entergy.com; T Holden; Lyon, Jill:(NMP); Bridget Frymire; ESTRONSKI@aol.com; tknauss@syracuse.com  
**Subject:** [External\_Sender] Passive equipment Failures

Good morning,

Looking in advance for failure of passive equipment

I feel that recent problems at Indian Point need to be recognized by the industry (and the regulator) as a result of our present industry-wide deficient and dated philosophy toward nuclear plants. Our original philosophy, continuing to this day, is that we only need to worry about active failures. After all, the plants are new enough so the most likely failures would be (only) of active equipment. You know: pump motor starts but fails to run....something like that. River water pipe starts to leak where it joins a heat exchanger of a different material is many years off into the future.

Guess what? That future is now. I have seen this clearly at Indian Point recently.

One example would be the recent Unit 2 plant shutdown to repair a leak at a joint between 2 hard-to-weld metals. If I ever get to see the root cause, I would guess it would have to reference (passive) material aging not sufficiently addressed for 40 years. I would also classify this problem as one effecting passive equipment.

Another recent problem there is the loss of baffle-former bolts from inside the pressurized water reactor vessel. Here again, I would expect one root cause to be an insufficiently applied aging management program because, if a sufficient one had been in force, baffle-former bolts with indications would have been replaced before entire baffle-former bolts were lost. Could I note that I classify these baffle-former bolts as passive equipment? (And while we are here, has even one word been uttered publically about why those loose parts monitors supposedly installed on PWRs, did not "monitor" loose bolts carried around in the reactor coolant to some yet unknown location?) Finally, let me say that I have read EPRI MRP 227, Rev 1 (not Rev A), and have found it to be a very high quality document that is now available to address aging. However, after reading it entirely, I do not believe it points out to the reader that it is addressing passive components.

A further example, also from Indian Point, Unit 2 is their magical transfer of contaminated water from inside the "containment" building to the (outside) site groundwater without anybody there noticing that containment building integrity must have been lost for this to have happened. Perhaps if the containment building concrete had been considered as passive equipment, likely to fail both with age and exposure to acidic drainwater from passive and crackable floor drains, somebody would have noticed.

Here is my main point: we have to start accounting for failures of passive components now that the nuclear plants are old, not just failures of active components.

Thank you,

Tom Gurdziel



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