

May 23, 2017

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

Dear Mr. McCree:

On behalf of the Union of Concerned Scientists (UCS), I submitted a petition (ADAMS ML16196A283) dated July 14, 2016, to you pursuant to Section 2.206 of Title 10 of the *Code of Federal Regulations*. You assigned the petition to the Office of Nuclear Reactor Regulation for handling per Management Directive 8.11.

Our petition requested that the U. S. Nuclear Regulatory Commission (NRC) take enforcement action in the form of a Demand For Information (DFI) to the licensee of the Diablo Canyon Nuclear Power Plant. Our petition cited Requests for Additional Information (RAIs) the NRC staff sent this licensee in response to incomplete and inaccurate information it found during a review of a license amendment request (LAR). The DFI we sought would have had the licensee explain the corrective actions it had taken and planned to take to comply in the future with the regulatory requirement in 10 CFR 50.9 that licensees submit complete and accurate information to the NRC.

By letter dated May 12, 2017, Mr. William M. Dean provided me with the final director's decision regarding our petition. The NRC denied our request for a DFI. Rather than put words into the NRC's mouth that might not fairly represent the staff's position, I will quote verbatim from the Director's Decision. The entire Director's Decision is available online (ADAMS Accession No. ML17108A552) for confirmation that these extractions are not out of context or otherwise misleading:

*The NRC staff has several tools within the license amendment review process to obtain the necessary information to make an appropriate and informed regulatory finding. Various regulatory requirements and NRC internal processes outline the mechanisms the NRC staff can use to acquire the additional technical information necessary to support the NRC's determination on whether a proposed licensing action continues to support adequate protection of the public health, safety, and the environment. (pages 3-4)*

*The acceptance review process is detailed in NRR Office Instruction LIC-109, Revision 2, "Acceptance Review Procedures" (ADAMS Accession No. ML 16144A521), and addresses the process for determining whether a submittal has sufficient information for the NRC staff to begin its technical review. The acceptance review is not a detailed technical review and is not intended to determine the acceptability of the requested change, only whether the application is sufficient for the NRR staff to begin a detailed technical review. (page 4)*

*When the NRC accepts an LAR for review, the NRG staff begins its detailed technical review with the goal of completing an independent assessment of the proposed action against applicable*

*regulatory requirements and guidance with the objective of assuring the protection of public health and safety, following the guidance in Office Instruction LIG-101, Revision 5, "License Amendment Review Procedures" (ADAMS Accession No. ML 16061A451 ). The NRC recognizes that additional information may be needed for the NRC staff to independently come to a conclusion about the technical adequacy of an LAR. (page 5)*

*The NRC staff can also leverage other appropriate communication means, such as public meetings and teleconferences, in order to enhance clarity and understanding both during the development of draft RAIs and after sending RAIs to the licensees. Use of such communication tools with the licensees facilitates the staff's understanding of licensee submittals, can reduce the number of RAIs needed, and enhances the licensees' understanding of RAIs and their ability to respond effectively. (page 6)*

*In summary, the NRC staff has several tools within the license amendment review process to obtain the necessary information to make an appropriate and informed regulatory finding. (pages 6-7)*

I hope I properly characterize the theme of the Director's Decision that RAIs are an expected and routine component of the healthy and thorough process employed by the NRC staff in reaching appropriate and informed regulatory decisions.

Assuming that I've faithfully captured the essence of the Director's Decision, I then applied that standard to how the NRC staff handled 2.206 petitions since January 1, 2011. After all, if the NRC asking questions is a tried and true element of the healthy and thorough process leading to appropriate and informed regulatory decisions, one would expect the staff to ask petitioners a comparable volume of questions. The NRC may even ask more questions since petitioners are not as practiced as licensees in using proper terms of art when describing safety issues and may not be as adept at citing chapter and verse of applicable regulatory requirements.

I reviewed the transcripts from 71 public meetings conducted by the NRC about 2.206 petitions since November 2010. Most of these meetings were requested by the petitioners per Management Directive 8.11 to meet with the Petition Review Board (PRB) before the board decided whether to accept all or part of the petitions into the 2.206 process. The rest of the meetings were requested by the petitioners to meet with the PRB regarding its initial decisions to reject the petitions from the 2.206 process.

Table 1 summarizes the questions asked, if any, by the NRC staff of the petitioners, by the court reporters, and by non-petitioner members of the public. The NRC staff asked no questions of the public in 36 of the 71 meetings (50.7 percent). Overall, the NRC staff asked 77 questions of the petitioners, slightly less than double the number of questions (40) posed by the court reporters. Not all of the NRC's questions to petitioners could be considered substantive or probing. For example:

- The NRC asked petitioner Saporito if he understand the verbal process for granting relief requests.
- The NRC asked petitioner Leyse if he was still there after it sounded like his phone dropped out.
- The NRC asked petitioner Mulligan if he was suggesting that the NRC's process was flawed.
- The NRC asked petitioner Saporito if he understood how long it takes the Reactor Oversight Process to process findings.
- The NRC asked petitioner Criscione if any other reactors other than the one that was the focus of his petition used similar shutdown procedures.

- The NRC asked petitioner Leyse if reactors other than the one that was the focus of his petition had passive autolytic recombiners.

True, some of the 71 meetings entailed extensive dialogs between the NRC staff and the petitioners. Well, two of them did. The NRC staff asked 10 questions during the May 7, 2013, pre-PRB meeting on the petition filed by the Nuclear Information & Resource Service (NIRS) and others regarding financial qualifications for Entergy's merchant reactors including:

- What are your thoughts about Entergy being a diversified company capable of shifting resources to cover any shortfalls?
- Is it your position that profits from a regulated part of the company would not carry over to the unregulated part?
- Could you address how financial stress causing cumulative impacts will be identified?

And the NRC staff asked 11 questions during the November 15, 2012, pre-PRB meeting on the petition filed by Barry Quigley regarding the high energy line break (HELB) analyses of the turbine buildings at Byron and Braidwood including:

- What are the differential pressures across walls and the associated impulse loads?
- Do the loads last less than a second?
- Can you clarify your concern about the high temperature qualification of protective relays in the Engineered Safeguards room?

But these PRB-related transcripts may tell a misleading story. After all, many of the meetings involved submittals that the NRC staff later rejected after determining they failed to satisfy the criteria for being handled via the agency's 2.206 process. By extension, presumably these submittals did not raise technical or procedural disputes and therefore would not foster probing, substantive questions by the NRC staff.

So, I reviewed the Final Director's Decisions since February 2011 from 25 submittals accepted by the NRC into its 2.206 process. These director's decisions contained chronologies of when the petition was initially submitted, the dates of public meetings between the petitioners and the PRB, and the dates of letters to/from the NRC staff, the petitioners, and the licensees about the petitions. In other words, if the NRC staff had queried the petitioners for additional information outside the pre-PRB and post-PRB public meetings, the director's decisions would indicate these communications.

Table 2 summarizes the questions asked of petitioners by the NRC outside of the pre-PRB and post-PRB meetings summarized in Table 1. With one exception (Barry's Quigley's HELB petition), the NRC staff asked no further questions of and sought no additional information from the petitioners en route to preparing the proposed director's decisions. And lest the petitioners be dismissed cavalierly as having anti-nuclear agendas or being tree-huggers, Table 2 reveals that petitioners included a Member of the U. S. House of Representatives, the Attorney General from the State of New York, a veteran plant worker, two former plant workers, and a former NRC worker.

Table 2 indicates an interesting history for the petition submitted by the Natural Resources Defense Council (NRDC) regarding hydrogen control at Indian Point. NRDC met with the NRC staff before the PRB made its initial recommendation regarding acceptance of the petition. The PRB recommended rejecting the petition and notified NRDC of that decision. At NRDC's request, the NRC staff met with the petitioners on September 12, 2012. NRDC persuaded the PRB to reverse its initial recommendation and to accept the submittal into the 2.206 process.

For my comments (ADAMS ML17102A524) on the proposed director's decision for our Diablo Canyon petition, I tallied up the number of records in ADAMS issued by the NRC with "request for additional information" in the document title. Table 3 replicates those tallies. The more than 6,268 RAIs between 2009 and 2017 represents many more questions since a single RAI frequently poses multiple questions.

I present these statistics not to suggest that there must be parity between the number of RAIs posed by NRC to its licensees and the number of questions asked of 2.206 petitioners. In other words, I am not seeking to have the NRC ask N questions of each 2.206 petitioner if additional homework reveals that the NRC asks an average of N questions of each licensee. Quotas may have their proper places, but this is certainly not among them.

I present these statistics to reveal a significant bias that I sincerely believe exists between how the NRC staff interacts with its licensees and its 2.206 petitioners. The basis for that belief dates back to the training leading to my certification as a Shift Technical Advisor (STA) at Browns Ferry. The classroom training included one week on "touchy feely" stuff. It probably wasn't called that on the agenda, but that's what it covered. The classroom instruction described how to, and how not to, handle interactions with your supervisor, interactions with your subordinates, interactions with co-workers, and so on. The training introduced us to PCA—parent, child, and adult—roles that can greatly enable or irreparably harm interactions. The RAI interactions between the NRC staff and its licensees are almost always adult to adult communications. But the interactions between the NRC staff and its 2.206 petitioners are too often parent to child.

Why does the NRC staff ask its licensees so many questions about submittals that are, by federal regulation, supposed to be complete and accurate in all material aspects? Because the NRC staff views its licensees as peers—other adults that may have useful inputs for the pending regulatory decisions.

Why doesn't the NRC staff ask its 2.206 petitioners many questions about technical and procedural issues within their petitions? It's probably not because the 2.206 petitioners are vastly more competent and capable than licensees and can develop submittals so darned complete and accurate that there are no seams for NRC to probe. It's more likely because the NRC staff assumes the role of parental and sees little to be gained in asking mere children about pending grown-up decisions.<sup>1</sup>

The interactions between the NRC staff and petitioners NIRS and Quiqley (see Table 1) are reflective of the healthy and thorough interactions leading to appropriate and informed regulatory decisions that were explained to me in the director's decision for our Diablo Canyon petition. But Tables 1 and 2 strongly suggest there are the exceptions rather than the rule. Therefore, the rule is then unhealthy and shallow interactions between the NRC staff and its 2.206 petitioners that result in inappropriate and misinformed regulatory decisions.

The NRC does not assume that its licensees have submitted all information needed by the agency to make proper regulatory decisions and asks RAIs to ensure it has the full picture. Likewise, the NRC must not assume that its 2.206 petitioners possess no information that might be useful in making regulatory decisions. The reversal of the initial decision by the NRC to reject the NRDC hydrogen control petition (see Table 2) demonstrates that 2.206 petitioners can possess information that change regulatory decisions.

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<sup>1</sup> I seem to have the use of but not control over a time machine. When I worked in the nuclear industry pre-1997, I attended public meetings where I was treated like an adult by the NRC. Then I joined UCS and apparently time traveled back to my youth, at least in how the NRC treated me. I joined the NRC in 2009 and time traveled back to being a grown-up again. I returned to UCS in 2010 and apparently also returned to my younger days. Fortunately, my adult-child-adult-child transformations do not require new wardrobes or I'd be broke.

Two decades ago, I joined other representatives of non-governmental organizations (NGOs) in a series of public meetings conducted by the NRC about the 2.206 process. More recently, I joined other NGO representatives in an October 2014 public meeting (ADAMS ML14311A747) conducted by the NRC about the freedom of information act process. These adult-to-adult meetings resulted in substantive progress toward making these processes more useful and efficient. I understand that the NRC's Office of the Inspector General (OIG) is auditing the 2.206 process and will be issuing its report in the not-too-distant future. UCS respectfully requests that the NRC conduct one or more public meetings after the OIG audit report is publicly available to discuss strengths and shortcomings of the 2.206 process with the objective of expanding the former and contracting the latter.

Sincerely,

A handwritten signature in blue ink that reads "David A. Lochbaum". The signature is written in a cursive style with a large initial 'D'.

David Lochbaum  
Director, Nuclear Safety Project  
Union of Concerned Scientists  
PO Box 15316  
Chattanooga, TN 37415

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Beyond Nuclear	Forgings	03/08/2017	ML17081A418	<p>Is there anyone else part of the petition that wants to speak now?</p> <p>You spoke about microsegregation, did you mean to say macrosegregation?</p> <p>Do you have references for macrosegregation going through the material?</p> <p>Court report asked for the spelling of Hovanec.</p>
Thomas Saporito	Drones (followup to 10/20/2015 meeting)	01/14/2016	ML16019A475	<p>None</p> <p>Court reporter asked for spelling of names.</p>
UCS et al	Pilgrim Design Basis Flood	08/05/2015	ML15230A017	<p>None</p> <p>Court reporter asked for the spelling of Turco and of Cape Downwinders.</p>
Paul Blanch	Indian Point 50.59 for Natural Gas Pipeline (followup to 01/28/2015 meeting)	07/15/2015	ML15216A047	<p>Do you have any test data or examples showing how far the on e psi pressure wave extended from the blast?</p> <p>Can you elaborate on your contention that the risk analysis was tampered with?</p> <p>Do you have any information on the amount of gas flow to assume in calculations?</p>
Pilgrim Watch and Cape Downwinders	Pilgrim Security	06/09/2015	ML15176A313	<p>Has the University of Texas report you mentioned been provided or will it be provided?</p> <p>Have the petitioners received an email dated May 19 from an NRC staffer?</p>

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<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Paul Blanch	Indian Point 50.59 for Natural Gas Pipeline	01/28/2015	ML15044A459	<p>When a 42-inch gas pipeline breaks, first there would be an explosion followed by essentially a torch, is that correct?</p> <p>Is heat flux the limiting factor between the isolation valves closing in three minutes versus three hours?</p> <p>Member of the public asked if assessments had been performed for external hazards around other nuclear facilities.</p> <p>Another member of the public asked about the three minute isolation valve closure time significance.</p> <p>Court reporter asked for the spelling of Kuprewicz.</p>
Thomas Saporito	Ebola Outbreak Response	12/17/2014	ML14365A124	<p>Is the scope of your petition all licensees, or just power reactor licensees?</p> <p>Court reporter asked for the names of the PRB members.</p>
Mary Lampert	Pilgrim Emergency Plan	06/12/2014	ML14223A088	None
Chuck Johnson	Columbia Generating Station Seismic Design	04/30/2014	ML14148A358	None
Chuck Johnson	Columbia Generating Station Seismic Design	02/04/2014	ML14050A356	Have you emailed the referenced documents to me?
Beyond Nuclear et al	GE BWR I/II	09/13/2013 (followup to 05/02/2013)	ML13297A089	<p>None</p> <p>Court reporter asked the name of one of the petitioners who participated by phone.</p>
Mary Lampert	Pilgrim Hardened Vents (followup to 07/15/2013 meeting)	09/10/2013	ML13258A002	None

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<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Mary Lampert	Pilgrim Hardened Vents	07/15/2013	ML13203A347	None
Mark Leye and Riverkeeper	Indian Point Hydrogen Control (followup to 12/20/2012 meeting)	05/29/2013	ML13176A429	None
NIRS et al	Entergy's Financial Qualificaitons	05/07/2013	ML13135A001	<p>Do you have any citations other than the UBS analysis?</p> <p>What sources did you use for power projections?</p> <p>What did you get information about the Power Purchase Agreement for FitzPatrick?</p> <p>What are your thoughts about Entergy being a diversified company capable of shifting resources to cover any shortfalls?</p> <p>Is it your position that profits from a regulated part of the company would not carryover to the unregulated part?</p> <p>Won't any performance and safety issues be captured by NRC inspections?</p> <p>Can you explain what the petition says about value sharing between FirzPatrick and Indian Point?</p> <p>Is the value sharing over now that the FizPatrick Power Purchase Agreement is over?</p> <p>Can you address how financial stress causing cumulative impacts will be identified?</p> <p>Do you want to expand the scope of the petition to other Entergy plants?</p>

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Michael Mulligan	Pilgrim Safety Relief Valves	04/11/2013	ML13112B055	None
Michael Mulligan	Vermont Yankee Paperwork Inadequacies (followup to 01/09/2013 meeting)	04/02/2013	ML13099A311	None Court reporter asked for the spellings of some names.
Michael Mulligan	Peach Bottom Safety Relief valve Actuators (followup to 12/03/2012 meeting)	02/13/2013	ML13052A379	None Court reporter asked for name of NRC resident inspector at Peach Bottom
FOE	San Onofre Replacement Steam Generators	01/16/2013	ML13029A643	None
Michael Mulligan	Vermont Yankee Paperwork Inadequacies	01/09/2013	ML13016A278	What is the context for statement about a 300% increase in LERs about safety relief valves? Could you elaborate on your statement that “NRC will be a price?”
Mark Leyse and Riverkeeper	Indian Point Hydrogen Control	12/20/2012	ML13030A486	None Court reporter asked how to spell licensee’s name.
Thomas Saporito	St. Lucie Mark Hicks Case	12/11/2012	ML12353A497	None

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Wallace Taylor	Fort Calhoun License Revocation (followup to 08/27/2012 meeting)	11/19/2012	ML12352A279	<p>Can you clarify your point about the NRC first accepting and then rejecting the petition?</p> <p>Can you provide an example of an issue you noted in the transcript of the pre-PRB meeting? [NRC staff reported that the original transcript had errors and omissions and was re-issued following corrections.]</p> <p>A member of the public asked two process questions.</p> <p>The court reporter asked for the spelling of the names of the members of the public.</p>

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

Petitioner	Subject	Date	ADAMS ID	NRC Questions
Barry Quigley	Byron and Braidwood Turbine Building High Energy Line Break	11/15/2012	ML12347A354	<p>How was turbine building are subdivided for GOTHIC computer code?</p> <p>Requested copy of the GOTHIC model along with its inputs and outputs.</p> <p>What are the differential pressures across walls and associated impulse loads?</p> <p>Do the loads last less than a second?</p> <p>Did you perform a structural calculation for the block walls?</p> <p>Has the structural limit changed?</p> <p>Was differential pressure considered during the initial design of the block walls?</p> <p>Are the turbine building drawings proprietary?</p> <p>Did you have any one perform a peer check of your calculations?</p> <p>When will you provide the requested information?</p> <p>Can you clarify your concern about the high temperature qualification of protective relays in the ESF room?</p> <p>The court reporter emailed NRC questions about name spellings.</p>
Michael Mulligan	Palisades Roof Leak	10/24/2012	ML12320A564	<p>None</p> <p>Court reporter asked how to spell Entergy representative's name and spelling of jack Giessner's name.</p>

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Mark Leyse	Vogtle Units 3 and 4 Hydrogen Igniters (followup to 03/28/2012 meeting)	10/24/2012	ML12318A330	None.  NRDC asked about availability of documents NRC cited in rejecting the petition.
Michael Mulligan	Palisades Tank Leak	08/29/2012	ML12261A380	None  Court reporter asked what DORL stood for.
Wallace Taylor	Fort Calhoun License Revocation	08/27/2012	ML12250A714	None  Member of the public asked about safety culture at the plant.  Court reporter asked for spellings of four names.
UCS et al	Brunswick Spent Fuel Pool	08/15/2012	ML12234A730	Can you envision a situation when regulatory requirements would not apply to irradiated fuel in spent fuel pools?  Why require reactor building ventilation when radiation monitors would detect problems?  Court reporter asked for list of participants
Thomas King	Turkey Point Records Falsification	07/09/2012	ML13296A710	Are you alleging training records were falsified by upper management?  Are you aware of training records falsifications for other individuals?  What are the dates of the falsified training records?

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Mark Leyse and NRDC	Indian Point Hydrogen Recombiners	06/14/2012	ML12300A412	Why are passive autocatalytic recombiners an issue for Unit 2 but not Unit 3?  Why are recombiners an issue for Unit 2 and not other pressurized water reactors?  Do you know of other PWRs with passive autocatalytic recombiners?  Are your concerns confined to beyond design basis accidents or do they also apply to design basis accidents?  Court reporter asked for copy of the service list.
Coalition	FitzPatrick Non-Hardened Containment Vent	05/10/2012	ML12132A279	None  Court reporter had several questions answered offline
Mark Leyse	Vogtle Units 3 and 4 Hydrogen Igniters	03/28/2012	ML12103A371	Relevance of CORA test results to petition?  Court reporter asked for service list.
Michael Mulligan	Peach Bottom SRV Event	02/17/2012	ML120650617	None  Court reporter asked for NRC to call about spellings.
Michael Mulligan	Palisades Safety Issues	01/31/2012	ML120370395	None

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

Petitioner	Subject	Date	ADAMS ID	NRC Questions
Larry Criscione	Callaway Shutdown Procedure	01/09/2012	ML120720212	<p>What other plants use the same or similar shutdown procedure?</p> <p>Member of the public asked a question that the NRC said was inappropriate for this forum and attempted to keep the petitioner from answering – the petitioner answered it anyway.</p> <p>Member of the public asked NRC how to ask a question that would get answered.</p> <p>Member of the public asked whether the pending shutdown for a refueling outage would be affected by the issue. NRC referred the question to Region II I for answering at some later date.</p> <p>Another member of the public asked NRC why NRC wasn't answering questions asked by the petitioner. NRC explained that the process allows NRC to ask questions, but no one else.</p> <p>Court reporter asked for names of participants.</p>
Thomas Saporito	North Anna Earthquake (followuup to 09/29/2011 meeting)	11/07/2011	ML113530035	<p>None</p> <p>Court reporter asked for a list of participants.</p>
Michael Mulligan	Vermont Yankee Turbine Building Exhaust	10/25/2011	ML11305A152	None
Beyond Nuclear et al	GE BWR Mark I/II Reactors (followup to 06/08/2011 meeting)	10/07/2011	ML11292A162	None
Thomas Saporito	North Anna Earthquake	09/29/2011	ML11332A046	<p>None</p> <p>Court reporter asked the spelling for the Dominion representatives</p>

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Thomas Saporito	Fort Calhoun Flood Protection	08/29/2011	ML11256A036	None
Thomas Saporito	St. Lucie Component Cooling Water Design (followup to 07/07/2011 meeting)	08/16/2001	ML11242A013	Any information on CCW event other than covered in petition?  Any metallurgic analysis on reactor vessel?
Thomas Saporito	Quality Assurance / Quality Control	08/04/2011	ML11228A141	None  Court reporter had a couple of questions that were answered offline
Thomas Saporito	HB Robinson Fires (followup to 06/14/2011 meeting)	07/28/2011	ML11243A025	None, but corrected misstatement by petitioner: meeting with licensee was not a pre-enforcement conference
Riverkeeper	Indian Point Peak Clad Temperature (followup to 04/18/2011 meeting)	07/11/2011	ML111990427	None
Thomas Saporito	St. Lucie Component Cooling Water Design	07/07/2011	ML11242A014	None
Thomas Saporito	Limerick Scrams	06/30/2011	ML112410442	Do you have information that the reactor vessels at Limerick are embrittled?  What is your understanding of how long it takes the ROP to process findings?  Do you have any information supporting your assertion that the resident inspectors failed to thoroughly examine the two scrams?

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Michael Mulligan	Vermont Yankee Safety Relief Valves (followup to 04/13/2011 meeting)	06/15/2011	ML11172A101	None  Court reporter asked for spelling of person named Setzer
Thomas Saporito	HB Robinson Fires	06/14/2011	ML11243A024	Citation for reference to UCS report  Does petitioner seek enforcement action against CEO?
Beyond Nuclear et al	GE BWR Mark I/II Reactors	06/08/2011	ML11167A114	Basis for contention that there isn't backup power for spent fuel pool cooling.  Citation for reference to Dr. Robert Kennedy's spent fuel fragility statement.
Thomas Saporito	Reactors Located Near Earthquake Fault Lines (followup to 04/14/2011 pre-PRB meeting)	05/25/2011	ML11146A010	None
Michael Mulligan	Vermont Yankee Issues (followup to 04/06/2011 pre-PRB meeting)	05/16/2011	ML11145A004	None
Michael Mulligan	Vermont Yankee Reactor Building	05/04/2011	ML11132A002	None
Riverkeeper	Indian Point Peak Clad Temperature	04/18/2011	ML111570242	None  Court reporter asked for names of Entergy representatives on the call.  Court reporter asked for the name of someone at NRC to call in case of questions.
Thomas Saporito	Reactors Located Near Earthquake Fault Lines	04/14/2011	ML11109A014	None

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Michael Mulligan	Vermont Yankee Safety Relief Valves	04/13/2011	ML11110A019	None
Michael Mulligan	Vermont Yankee Issues	04/12/2011	ML11110A020	None Court reporter asked whether it was “Vernon tie” or “burning tie”
Michael Mulligan	Vermont Yankee Issues	04/06/2011	ML111020331	What information do you have on the size and number of cracks in the reactor building? Are you suggesting that our process is flawed?
Michael Mulligan	Palisades Recurring Problems (followup to 03/07/2011 meeting)	03/31/2011	ML110960237	None
Michael Mulligan	Vermont Yankee Security (followup to 03/08/2011 meeting)	03/28/2011	ML110910337	None
Michael Mulligan	Vermont Yankee Security	03/08/2011	ML110730373	What was the timeframe for your personal observations at the plant? You mentioned consulting on recent security issues. What was the form of this consulting? Court reporter asked how to correctly spell Devincentis. Court reporter asked how to correctly spell Schentzlerr.
Michael Mulligan	Palisades Recurring Problems	03/07/2011	ML110760687	None Court reporter asked for a list of participants.

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Michael Mulligan	Vermont Yankee Augmented Offgas System (followup to 02/03/2011)	03/02/2011	ML110680070	None  Court reporter asked for the identity of one speaker.
Paul Blanch	Indian Point Pipeline (followup to 11/02/2010 and 11/09/2010 meetings)	03/03/2011	ML110680090	Were you informed that NRC's processing of the petition would take additional time?
Mark Leye	Oyster Creek and Nine Mile Point Peak Clad Temperature (followup to 01/13/2011 meeting)	02/17/2011	ML110840219	Do you have any evidence that the CORA test was made under conditions consistent with a loss of coolant accident?
Michael Mulligan	Vermont Yankee Sanctions	02/14/2011	ML110550194	None  Court reporter asked for correct spelling of Couture.
Ray Shadis	Vermont Yankee Feedwater Leak	01/20/2011	ML110310378	Are you contending that the feedwater leak should have caused the NRC not to have reasonable assurance of safety?  Member of the public asked if a transcript of the meeting would be available.  Court reporter asked NRC to call about an item.

**Table 1: Questions Asked During Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Date</b>	<b>ADAMS ID</b>	<b>NRC Questions</b>
Mark Leyse	Oyster Creek and Nine Mile Point Peak Clad Temperature	01/13/2011	ML110840219	Could you repeat the ML number?  Are you still there? It sounds like his phone may have cutoff.  Have you filed a FOIA for the non-public records you seek?  What, in layman's terms, are you asked NRC to do?  Are the plants in the petition currently in violation of regulatory requirements?  Member of the public asked whether the NRC or the licensee have reasonable assurance.
Barry Quigley	Byron Pressurizer Safety Valve	01/12/2011	ML110260217	None
Larry Criscione	Callaway Shutdown Event	12/13/2010	ML110140104	How did the plant get into the shutdown situation?  You said reactor, but you meant turbine, right?  The operators used normal procedures during the shutdown, not emergency operating procedures, right?  They could have emergency borated had they needed to, right?
Thomas Saporito	Duane Arnold Weld Repair	11/22/2010	ML110620471	Do you understand our verbal process for granting relief requests?

**Table 2: Questions Asked Outside Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Director's Decision Date</b>	<b>ADAMS ID</b>	<b>NRC Questions Before Proposed Director's Decision</b>
UCS	Diablo Canyon 50.9	05/12/2017	ML17108A552	None indicated.
FOE	Diablo Canyon Earthquake	04/21/2017	ML17095A932	None indicated.
SACE	St. Lucie Steam Generator Replacement	07/08/2016	ML16167A079	None indicated.
Michael Mulligan	Vermont Yankee and Kewaunee Vessel Exams	03/29/2016	ML16054A691	None indicated.
Beyond Nuclear	North Anna Earthquake (revision to 08/22/2015 decision)	10/30/2015	ML15293A454	None indicated.
UCS	BWR Mark I/II GDC 44 and EQ	11/02/2015	ML15132A625	None indicated.
Thomas Saporito	Turkey Point Ultimate Heat Sink	09/23/2015	ML15237A179	None indicated/
NIRS	Entergy Financial Qualifications	08/27/2015	ML15162A690	None indicated, but NRC issued the licensee a request for voluntary information (ML13357A024) which the licensee provided (ML14212A050).
Beyond Nuclear	North Anna Earthquake	08/21/2015	ML15175A465	None indicated.
Thomas Saporito	Earthquakes	06/17/2015	ML14114A411	None indicated.
Sierra Club	Fort Calhoun Safety Issues	06/03/2015	ML15128A346	None indicated.

**Table 2: Questions Asked Outside Pre-PRB and Post-PRB Public Meetings**

<b>Petitioner</b>	<b>Subject</b>	<b>Director's Decision Date</b>	<b>ADAMS ID</b>	<b>NRC Questions Before Proposed Director's Decision</b>
Thomas Saporito	Cooper and Fort Calhoun Flooding	06/03/2015	ML15128A134	None indicated.
Michael Mulligan	Palisades Issues	04/06/2015	ML15054A396	None indicated.
Barry Quigley	Byron and Braidwood HELB	12/22/2014	ML14239A370	NRC asked for information about modeling methods, inputs, and assumptions by petitioner of HELB cases.
UCS	FitzPatrick Condenser Tubes	10/17/2014	ML14247A311	None indicated.
George Walther-Meade	Revoke CSMI LLC License	05/27/2014	ML14128A271	None indicated.
Thomas King	St. Lucie Ames Group	01/14/2014	ML13329A081	None indicated.
UCS	Brunswick Spent Fuel Tech Specs	12/30/2013	ML13339A588	None indicated.
NRDC	Indian Point Hydrogen Control	06/07/2013	ML13128A397	PRB initially recommended rejecting the petition; petitioners met with the PRB again on 09/12/2012 and were notified on 11/15/2012 that their petition was accepted. Otherwise, none indicated.
NYS Attorney General	Indian Point Fire Protection	10/24/2012	ML12240A068	None indicated
Thomas Saporito	North Anna Earthquake	04/26/2012	ML12094A249	None indicated.
Sherwood Martinelli	Decommissioning Funding	11/08/2011	ML112870533	None indicated.
Thomas Saporito	Vermont Yankee Safety Relief Valves	09/09/2011	ML112240877	None indicated.
UCS	Davis-Besse Pressure Boundary Leakage	02/15/2011	ML110250223	None indicated
Congressman Paul Hodes	Vermont Yankee Tritium Leaks	02/02/2011	ML110060012	None indicated

## Table 3

### Number of Records in ADAMS Issued by NRC with “request for additional information” in the Title

Year	Number of Records
2017 (through 03-26)	63
2016	443
2015	527
2014	752
2013	802
2012	846
2011	835
2010	1,000-plus
2009	1,000-plus