

From: Tom Gurdziel <tgurdziel@twcny.rr.com>
Sent: Saturday, June 24, 2017 10:31 AM
To: Guzman, Richard
Cc: Bridget Frymire
Subject: [External_Sender] RE: 2.206 Petition from T. Gurdziel dated June 11, 2017 re: Indian Point Unit 3

Hello Rich,

I found the most recent Entergy/Indian Point Unit 3 reactor vessel/reactor vessel upper head leak to be particularly annoying, not because it has happened two times in a row, but because it makes clear (to me, anyhow) that the level of skill, knowledge, communication, supervision/management, and initiative in the industry today, (after Fukushima), is not sufficient.

Region 3

Maybe it wasn't insufficient before, but we more or less accepted a lazy operations/maintenance department response at Entergy/Palisesades that could not change a lightbulb on the containment airlock door, which was important because a non-fully latched outer airlock door prevented personnel exit through the now unopenable inner airlock door. The result here was that an inspecting crew was trapped inside long enough for heat effects to become apparent.

Region 4

Or, an all-eyes-closed QC effort when it came to questioning those three high accelerometer readings on a Southern California Edison/SONGS replacement steam generator that just happened to be the one that leaked. I consider the cost to the industry here as one and maybe 1 ½ nuclear plants (considering using the second ½ plugged). (The industry can't blame this on "low" natural gas prices).

Region 2

And how about letting your Progress Energy/Crystal River employee save you one million dollars by not following seasoned, experienced advice, (given at no cost), to not quickly sever heavily loaded containment post tensioned tendons? Didn't that save them the one million dollars but cost they the entire plant? (The industry can't blame this on "low" natural gas prices either, can it?)

Region 1

Assuming Entergy has provided its site people with computers, and e-mail, and fax machines, and telephones, (and permission to use them), how could nobody have acquired information from all the plants in their fleet, and an owners group, and EPRI, and INPO such that after 40 plus years (and trouble after the last refueling outage), the reactor to reactor head joint leaks again? (And I think I forgot that additional defense-in-depth level provided by the Entergy "CFAM" group.) (You can't blame 10 days of lost generation on "low" natural gas prices, can you?)

Final Thoughts

I think, after Fukushima, that it is pretty clear that we cannot provide procedural guidance for everything that can happen to a nuclear powerplant. (Everything includes “design basis” and “beyond design basis”.) We need operators (including maintenance) that can think on their feet. It is not clear that we have that today.

Thank you,

Tom

From: Guzman, Richard [<mailto:Richard.Guzman@nrc.gov>]
Sent: Thursday, June 22, 2017 4:25 PM
To: 'tgurdziel@twcny.rr.com'
Subject: 2.206 Petition from T. Gurdziel dated June 11, 2017 re: Indian Point Unit 3

Mr. Gurdziel,

Good Afternoon. As we discussed, I have been assigned as a Petition Manager for the 10 CFR 2.206 petition you submitted to the U.S. Nuclear Regulatory Commission (NRC) on June 11, 2017, regarding your concerns with the reactor vessel head o-rings at Indian Point Nuclear Generating Unit No. 3.

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 is in [Management Directive 8.11](#), which is publicly available.

The 2.206 process provides a mechanism for any member of the public to request enforcement action against NRC licensees. The 2.206 process is separate from the allegations process 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.

You specifically requested in your e-mail for the NRC to keep Indian Point, Unit 3 (IP3) in cold shutdown until the condition of the reactor vessel head upper and lower surfaces are “proved to be identical to the as-purchased condition”. The NRC considers your request as a short-term, immediate action given that IP3 is in the process of restarting from its maintenance outage. On June 22, 2017, your request for immediate action was reviewed by members of the Petition Review Board (PRB), which includes staff from the NRC’s Office of Nuclear Reactor Regulation (NRR) and Region I. After its review and discussion, the PRB determined that there were no immediate safety concerns which would adversely impact the public’s health and safety; therefore, the PRB denied your request for immediate action in the restart of IP3. Specifically, the PRB noted that plant technical specifications require the licensee to monitor for unidentified leakage into containment and specifies actions if leakage were increase in excess of these limits, up to and including a plant shut down. Unidentified leakage at IP3 is currently within the limits specified by this requirement.

In accordance with NRC Management Directive 8.11, you have the opportunity to address the PRB, either in person at the NRC Headquarters in Rockville, MD, or by telephone conference. The purpose of this interaction is so that the petitioner can discuss the petition and verbally supplement the petition with any new information. During the meeting, the PRB is in listening mode and will not make any decisions regarding your petition. I understand from our conversation today that you would like to decline the opportunity to address the PRB at this time.

If you have other questions on the 2.206 process, or regarding the role as petition manager, please contact me at 301-415-1030.

Thank you,

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Rich Guzman  
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