

**From:** [Dave Lochbaum](#)  
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**Subject:** [External\_Sender] Relative value of NRC vs. nuclear industry safety assessments  
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Good Day:

My second commentary on why NRC nuclear safety inspections are necessary was posted this morning to UCS's All Things Nuclear blog at <http://allthingsnuclear.org/dlochbaum/nrc-safety-inspections-indian-point>

The NRC is currently reviewing how it conducts engineering inspections with the objective of seeing if they can be made more efficient and effective.

The nuclear industry has a proposal --- the NRC's engineering inspections can be made more efficient and effective by eliminating them. In their place, the industry would conduct self-assessments and mail their results to the NRC.

The posted commentary describes how NRC inspectors identified an inadequate self-assessment of an annoying and worsening safety problem at the Indian Point Energy Center in New York.

It's not that the NRC inspectors were smarter than plant workers. But workers fell more easily into the trap caused by incremental decision-making. The workers' first decision was about a very small leak (1/8 of a gallon per minute) from a pipe transporting up to 6,000 gallons per minute. They decided this small leakage was acceptable. Then it got a little worse. They decided it was still okay. Then the leak got a little worse and so on. The NRC inspectors' first decision was many iterations later when the very small leak was no longer very small. They considered the leaking pipe to a leak-free pipe --- the workers were considering today's leakage to the previous day's leakage. Two different questions with two different answers.

Time and again, the NRC's independent assessments - less encumbered than those of plant workers - find problems that had been overlooked or mis-diagnosed.

If we're going to get rid of something regarding the NRC's engineering inspections, let it be the talk about replacing them with industry self-assessments.

Thanks,  
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