

10 CFR 2.206 NRC petition

I wish to file this revised 2.206 petition for NRC to take enforcement action in the matter of NRC granting PG&E's request to extend the regulatory requirement for ultrasound inspections of the Diablo Canyon reactor's welds from ten years to twenty years, and call on NRC to reverse this decision and order the independent inspections now, while the reactor is shut for refueling.

My petition is based on information contained in Appendix A of a 2017 report published by Fairwinds Assoc., Inc., "Neutron Embrittlement at Diablo Canyon Unit 1 Nuclear Reactor", filed as expert testimony of Arnie Gunderson in a case before the California Public Utilities Commission ².

The report documents NRC's 2015 approval of PG&E's 10CFR part 50 request to extend the service interval requirements of the AFSME Boiler and Pressure Vessel Code, Section XI, Paragraph IWB 24132, "Inspection Program B" for Diablo Canyon Power Plant, which requires volumetric examination of virtually all pressure-retaining welds every ten years.

NRC staff supported ¹ PG&E's request to extend the inspection requirements of the Unit 1 reactor, from ten to twenty year intervals, despite Diablo Canyon reactor being identified by NRC as one of the five most embrittled reactors in the country and the fact the reactor vessel had been in operation beyond the length of its design specifications. Inspections due in 2015 were therefore not performed.

Since the 2015 decision, conditions at PG&E have changed. PG&E has declared bankruptcy, and the company's aging equipment ignited a gas line explosion in San Francisco earlier this year and sparked wildfires that have killed dozens of people since the 2015 decision. I feel granting this exemption to aging nuclear equipment of a company known for cutting safety corners was wrong and should be revisited.

Given the embrittlement danger to the welds of Unit 1 found, subsequent to licensing, to contain excessive amounts of copper that make these welds susceptible to embrittlement from neutron bombardment, this rule change makes no sense. In the words of Union of Concerned Scientist nuclear specialist, David Lochbaum ³, we need to stop this dangerous game of "nuclear roulette" before our luck runs out.

As of this writing the reactor is shut down for refueling, and I urge that the reactor not be allowed to operate until these weld inspections are carried out by an independent analyst. This is very important given the seismic threats that exist at the site ⁴, especially in the wake of Fukushima showing the dangers of underestimating possible scenarios.

I urge your immediate attention to this matter. Thank you.

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San Francisco, CA

Footnotes

¹ SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION REGARDING REQUEST FOR ALTERNATIVE RPV-U1-EXTENSION TO ALLOW USE OF ALTERNATE REACTOR INSPECTION INTERVAL REQUIREMENTS (for) PACIFIC GAS AND ELECTRIC COMPANY DIABLO CANYON POWER PLANT, UNIT 1
DOCKET NO. 50-275

² <https://www.fairewinds.org/s/Full-Report-Arnie-Gundersen-Testimony-On-Retirement-Of-Diablo-Canyon.pdf>

³ *The NRC and Nuclear Power Plant Safety in 2010: A Brighter Spotlight Needed*, David Lochbaum, Union of Concerned Scientists, March 2011

“While none of the (14 identified) safety problems in 2010 caused harm to plant employees or the public, their frequency—more than one per month—is high for a mature industry. The severe accidents at Three Mile Island in 1979 and Chernobyl in 1986 occurred when a handful of known problems—aggravated by a few worker miscues—transformed fairly routine events into catastrophes. That plant owners could have avoided nearly all 14 near-misses in 2010 had they corrected known deficiencies in a timely manner suggests that our luck at nuclear roulette may someday run out.

⁴ <https://www.govtech.com/em/disaster/PGE-Minimizes-Quake-Risks-Nuclear-Plant-Critics-Say.html>

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