

CHAIRMAN Resource

From: Tom Gurdziel <tgurdziel@twcny.rr.com>
Sent: Friday, July 19, 2019 10:41 PM
To: CHAIRMAN Resource
Cc: Transformation.Resource@nrc.gov; Screnci, Diane; 'Ed Stronski'; Esberg, John R:(GenCo-Nuc); Bridget Frymire; Tfm Echols
Subject: [External_Sender] July 18, 2019 Confirmatory Order on Wolf Creek

Good morning,

Relative to the US NRC

I tried to read this order and found myself drifting off into space because of the repetition of almost all of the information provided from the page marked "3" to the page marked "9" on pages marked "10" to "15". So here is what I did. I printed off the entire Confirmatory Order and marked sections that caught my eye with a lead pencil. As a result, I have these comments.

If the mechanic admits, (on the unnumbered "Factual Summary" page of NRC Inspection Report 05000482/2019010), "to falsifying" information, for the US NRC to describe the problem (in the Confirmatory Order) as "inaccurate information" is to be seriously misleading.

Why did it take over one year of time, (October 31, 2016 to November 22, 2017) for the NRC Office of Investigations to get involved?

Notice on page 15 of the subtle way of changing things. Sections "S", "T", and "U" are no longer identified by letter. And, the reason for this is that, although some of the information is presented as if these sections are all here, they are not. Section "T" is not here. BUT there is something else now newly added: "The Regional Administrator, Region IV, may, in writing, relax or rescind any of the above conditions upon demonstration by Wolf Creek of good cause." WHERE IS THE AUTHORITY FOR THIS TO BE DONE? Is it to be done without notice to interested stakeholders?

Finally, did you notice that the "Consent and Hearing Waiver Form" was not signed by the President of Wolf Creek Nuclear Operating Corporation, AND the signature that was provided was not notarized. Doesn't that have to be done any more?

Relative to the nuclear plant operator

A long time ago, experienced PWR people knew that boric acid residue could not be a problem. After all, the boric acid would hit the hot reactor surface and turn into something that resembled white popcorn. And that's the way they ran Davis-Besse. It didn't bother them that containment air monitoring filters would get clogged much too quickly, they just changed them more frequently. Even changed their sampling location to an area that gave lower readings. The appearance of boric acid effects such as missing pieces of ventilation ductwork, eaten away by acid, was no concern either. But then, one day, one of the control rod drive mechanism penetrations slowly rotated above the reactor head. It turned out that boric acid residue was really a serious indicator of a problem.

The action of both the mechanic and supervisor described in just the first 4 paragraphs of the Office of Investigation Report 4-2018-008 Factual Summary make it very clear that one of the actions you should have taken was to teach your Wolf Creek staff the Davis-Besse accident. Also, don't you have any credible Quality Control function at your plant today? It does not seem like it to me.

Now here is the thing that bothers me a lot. The problem was that boric acid residue was not removed from CRDMs 4, 35, and 53. It needed to be removed. Has it yet? That should have been an action for you to take in that Confirmatory Order.

Let me ask you to do something more. Calculate how much it is going to cost to issue a stand-alone communication about willful violations not being tolerated (even though it appears they are). (This is from A, page 3.) Calculate how much it will cost to hold integrity and trustworthiness meetings (from B, page 4). Calculate how much it will cost to hold meetings with the staff of 4 departments on pertinent NRC actions, (C, from page 4). How much will it cost to reinforce site expectations from D, page 4? What is that industry presentation, (E, page 4), going to cost? Calculate the cost of a root cause analysis (from G, page 5). How much will benchmarking two other sites, (from H, page 5) cost? How much will it cost to prepare and provide in-person training to (all?) station staff, allowing for the possible need to prepare separately for contractors and for company employees? (This is from I, pages 5 & 6). How much will initial maintenance training cost and, especially, the need for periodic continuing maintenance training, from J, page 6? What is the cost of annual ethics training to all employees from K, page 6? This may be past already but what is the cost of a work order documentation self-assessment after refueling outage 23, from L, page 6? Also, and this may be past as well, what is the cost of the same work order documentation self-assessment after refueling outage 24, from M, page 7? How much does a third-party nuclear safety culture survey cost, from N, page 7? What about the cost of a second nuclear safety culture survey, from O, page 7? Calculate the cost of 3 different annual corrective action effectiveness reviews, from P, page 7. Looks like you need an estimate of 4 years of reports to the Regional Administrator for Q, page 8. What is the cost of records retention from R, page 8?

Do you have all that? Add it up and compare it to your cost if you would have fired those two people. Would any of that (above) have been found to be necessary if they were gone, or, maybe, even off without pay for one month?

Even if you are regulated, (not a merchant plant), I don't see how you can afford to incur all those costs above. Maybe we should ask ourselves: is this what gas fired combined cycle plant management would do?

Thank you,

Tom Gurdziel



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