

From: [Pruett, Troy](#)
To: [Lingam, Siva](#)
Cc: [Pascarelli, Robert](#); [Buckberg, Perry](#); [Felts, Russell](#)
Subject: RE: Grand Gulf 10 CFR 2.206 Petition (Ticket No. OEDO-19-00053; CAC No. TM3111)
Date: Thursday, August 29, 2019 8:03:18 AM

No public meeting is needed at this time.

From the list of documents I can assure you that NRC managers never discussed a Matrix deviation, nor does it appear there is any correspondence requesting a deviation. Additionally, at no time was a Confirmatory Action Letter or Order postulated during periodic assessments of Grand Gulf performance. Lastly, I understand Grand Gulf continues to have the worst performance in the nation and NRC oversight continues to be lacking.

Troy

From: Lingam, Siva
Sent: Thursday, August 29, 2019 6:17 AM
To: Pruet, Troy <Troy.Pruett@nrc.gov>
Cc: Pascarelli, Robert <Robert.Pascarelli@nrc.gov>; Buckberg, Perry <Perry.Buckberg@nrc.gov>; Felts, Russell <Russell.Felts@nrc.gov>
Subject: RE: Grand Gulf 10 CFR 2.206 Petition (Ticket No. OEDO-19-00053; CAC No. TM3111)

In response to your e-mail dated August 21, 2019, please find attached the list of documents reviewed by the PRB. Some of the key documents reviewed listed below contain the bases for the PRB's conclusion that the NRC has previously considered the three reasons included in your petition for additional enforcement action.

Reason 1 References 2, 3, 4, 8, 10, 16, 28, 30, 38
Reason 2 References 2, 3, 4, 9, 15, 16, 23, 25, 27, 28, 37, 38, 40, 42, 44, 47, 49, 61, 62, 65
Reason 3 References 5, 6, 11, 12, 20, 63, 64

The concerns raised in your petition were documented in publicly-available inspection reports or plant performance summaries that were discussed at Regional mid-cycle and end-of-cycle assessment meetings, chaired by senior Regional managers. These performance concerns were characterized as key messages for NRC managers to communicate to the licensee management.

All risk evaluations of inspection findings under the ROP are performed in accordance with program procedures. The evaluations are performed by qualified risk analysts, peer reviewed, and reviewed by management. These processes provide confidence in the reasonableness of assumptions and results. The concerns presented by you have been reviewed under both the non-concurrence and DPO processes, in addition to the normal processes. The routine processes and the differing views processes have concluded that the findings were evaluated appropriately.

Please advise whether you want to provide or address the PRB with supplemental information.

Thank you.

From: Pruett, Troy
Sent: Wednesday, August 21, 2019 11:43 AM
To: Lingam, Siva <Siva.Lingam@nrc.gov>
Subject: RE: Grand Gulf 10 CFR 2.206 Petition (Ticket No. OEDO-19-00053; CAC No. TM3111)

Because I have no idea of what the NRC did to review the petition, I can not be reasonably expected to provide the missing pieces. Accordingly, I again request to know the following:

1. What material (including ADAMS ML numbers) did the NRC review as part of the petition process?
2. All individuals that provided information.
3. Why the NRC believes an appropriate review of material had occurred prior to submission of the petition?

Providing the above is in keeping with agency values for respect, openness (transparency), and integrity.

Is the agency refusing to provide the above information? Perhaps we can schedule a public teleconference so the agency can provide their response to the above. After reviewing the material, we can then have a second public teleconference to discuss any omitted information.

Troy Pruett

----- Original Message -----

From: "Lingam, Siva" <Siva.Lingam@nrc.gov>
Date: Wed, August 21, 2019 7:58 AM -0500
To: "Pruett, Troy" <Troy.Pruett@nrc.gov>
CC: "Pascarelli, Robert" <Robert.Pascarelli@nrc.gov>, "Buckberg, Perry" <Perry.Buckberg@nrc.gov>, "Gillespie, Joe" <Joe.Gillespie@nrc.gov>, "Felts, Russell" <Russell.Felts@nrc.gov>
Subject: RE: Grand Gulf 10 CFR 2.206 Petition (Ticket No. OEDO-19-00053; CAC No. TM3111)

The written response will be in the closure letter. The written response comes only after you address the PRB with a new supplemental information. Per MD 8.11 process, please advise whether you want to address the PRB in person or by phone. Thank you.

From: Pruett, Troy
Sent: Tuesday, August 20, 2019 1:30 PM
To: Lingam, Siva <Siva.Lingam@nrc.gov>
Subject: RE: Grand Gulf 10 CFR 2.206 Petition (Ticket No. OEDO-19-00053; CAC No. TM3111)

I'd like a written response stating when, by whom, what, and why the NRC believes the concerns in the petition were adequately reviewed.

Troy Pruett

----- Original Message -----

From: "Lingam, Siva" <Siva.Lingam@nrc.gov>

Date: Tue, August 20, 2019 11:58 AM -0500

To: "Pruett, Troy" <Troy.Pruett@nrc.gov>

CC: "Pascarelli, Robert" <Robert.Pascarelli@nrc.gov>, "Buckberg, Perry" <Perry.Buckberg@nrc.gov>, "Gillespie, Joe" <Joe.Gillespie@nrc.gov>, "Felts, Russell" <Russell.Felts@nrc.gov>

Subject: RE: Grand Gulf 10 CFR 2.206 Petition (Ticket No. OEDO-19-00053; CAC No. TM3111)

Thank you for the response. The management directive and associated handbook state that in order for a petition to be accepted for review, it must raise issues that have not been the subject of a previous staff review. Accordingly, the process does not reopen or second guess these prior reviews, absent significant new information or materially different facts.

However, this meeting would be an opportunity for you to explain how prior reviews such as the Reactor Oversight Process determinations, Non-concurrence Process, risk determinations, etc. do not resolve the issues you have raised or for you to identify new facts in your petition that were overlooked that you believe warrant further review.

From: Pruett, Troy

Sent: Tuesday, August 20, 2019 10:43 AM

To: Lingam, Siva <Siva.Lingam@nrc.gov>

Subject: RE: Grand Gulf 10 CFR 2.206 Petition (Ticket No. OEDO-19-00053; CAC No. TM3111)

The information provided in the below email is insufficient to determine if further action on my part is warranted. I specifically request, in writing, the basis for how each of the referenced criteria were met, or not met.

Troy Pruett

From: Lingam, Siva

Sent: Tuesday, August 20, 2019 7:21 AM

To: Pruett, Troy <Troy.Pruett@nrc.gov>

Cc: Pascarelli, Robert <Robert.Pascarelli@nrc.gov>; Buckberg, Perry <Perry.Buckberg@nrc.gov>; Felts, Russell <Russell.Felts@nrc.gov>

Subject: Grand Gulf 10 CFR 2.206 Petition (Ticket No. OEDO-19-00053; CAC No. TM3111)

The Petition Review Board (PRB) made its initial assessment that your petition does not meet the Management Directive 8.11, "Review Process for 10 CFR 2.206 Petitions [Title 10 of the *Code of Federal Regulations* (10 CFR), Section 2.206]," and its associated Directive Handbook (DH) 8.11, "Review Process for 10 CFR 2.206 Petitions, Section III.C.1 criteria for acceptance under 10 CFR 2.206 since the issues raised in your petition have previously been the subject of U.S. Nuclear Regulatory Commission staff review and none of the provisions of DH 8.11, Section III.C.1(b)(ii) apply.

Per DH 8.11 Section III.F, the PRB is offering you an opportunity to provide any relevant additional explanation and support for your petition in light of the PRB's initial assessment. This opportunity would be at a public meeting or telephone conference with the PRB. We

are required to notice public meeting at least 10 days in advance. Please consider the meeting format described in DH 8.11 Section III.F, and please advise if you wish to meet with the PRB.

Thank you.

Siva P. Lingam
U.S. Nuclear Regulatory Commission
Project Manager
Palo Verde Nuclear Generating Station, Units 1, 2, and 3
Grand Gulf Nuclear Station
Location: O-9E22; Mail Stop: O-9E03
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