

Task Number: G20120819

Electronic Tracking System

General Information

Lead Assignee: NRR

OEDO Due Date: 11/26/2012

Other Assignees:

SECY Due Date:

Other Parties:

Subject: 2.206 - Peach Bottom

Description:

CC Routing: OGC, Region I

ADAMS Accession Numbers - Incoming:

Response / Package:

Other Information

Cross Reference

SRM\Other: No

Process Information

Action Type: 2.206 Review

OEDO Concurrence: No

Signature Level: Direct Reply

OCM Concurrence: No

Special Instructions:

OCA Concurrence: No

Document Information

Originator Name: Michael Mulligan

Date of Incoming: 10/13/2012

Originator Org:

Document Received by OEDO Date: 10/17/2012

Date Response Requested by
Originator:

Addressee: R. W. Borchardt, EDO

Incoming Task: 2.206

OEDO POC: Dan Merzke

Template: EDO-001

E-RIDS: EDO-01

Jaegers, Cathy

From: Michael Mulligan [steamshovel2002@yahoo.com]
Sent: Monday, October 15, 2012 12:30 PM
To: NRC Allegation
Subject: 2.206 on Not Qualified Components In Containment With VY and Peach Bottom
Attachments: New Oct 15 PB petition.wps

(Probably a better copy in attachment.)

Oct 13, 2012

R. William Borchardt
Executive Director for Operations
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Borchardt,

(Jan 24, 2012) Request an Emergency Peach Bottom nuclear plants 2 and 3 shutdown to replace all safety relief valves pneumatic actuators buna-n seals with nylon seals...or other high quality and durable materials designed and tested for elevated temperature." So this is a renewed requested based on *10 CFR 50.73(a)(2)(v)(D) concern*.

In other words, I am requesting all SRV seal materials be like vitol. They be able to withstand all containment accident conditions and temperatures (340/370 degrees F) . Not only is the buna-n seal material not qualified for worst accident temperature, but the whole actuator won't meet 10 CFR 50.73(a)(2)(v)(D) including wiring insulation or any other buna or nitrile based elastomers (rubber or plastic) gaskets or seal material. Any material that won't stand up to the accident temperatures or conditions.

Any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident. Including wiring insulation and other plastic or rubber like material of the actuator or components.

This is how the September 4, 2012 Petition Board final response answers me:

The PRB determined that there was no immediate safety concern to the plant or to the public health and safety to justify the requested immediate action.

So the NRC is only required to answer immediate safety defects in a 2.206 ...long term safety defects are not the preview of the NRC. And the agency don't have the decency in the petition process to answer the "not immediate" safety problems me. Come on, is this the USA? And they spin up any definition of "safety" in some computer model that nobody can understand...they diminished all other's concepts of safety that disagrees with the USA's nuclear village. You see this, the NRC on fear of pain with illegal falsification didn't even answer if Peach Bottom could meet all licensing accident bases containment environmental (max temperature-360 degrees F) requirements.

I bet you they had the NRC's lawyers working on this short response. It is the safety granularity Martha, are they talking about the safety of actuator seals in normal operation mode or the deeper safety of max temperature requirements of extremely important containment core cooling components in a accident. Is completely accurate answers nuclear safety...it public truth and honesty nuclear safety? Do they see these safety defects in the holistic whole and all...or does the agency just choose what segments of safety that favors our USA nuclear village? Is nuclear safety just the protection they feel of not seeing things in whole? The NRC is supposed to be able to write better than that.

The chances of having this kind of accident is slim, but the worst case would have devastating consequences to our nation. It is unimaginable, a common mode failure of the SRVs and now other air safety actuators outside the safety relief valves...it is across many plants. I guess it just a matter what your definition of safety is. These federal officials are playing word games with safety...they are play footsies with each other under the table and being exclusionary to outsiders.

So the below is a written quote from project manager Mr Hughney. He was decent to me. It is clear I am talking about accident conditions. I been telling everyone, the NRC and Exelon are withholding most of the information from me, severely limiting my participation in a 2.206 proceeding. I know the system is making me running around here 95% blind. The system always intends the agency gets to legally answer me with a "you have insufficient information" even when they know I am completely right.

You notice the agency never answers me with a legal "your issues have absolutely no bases". They infer a weak response of "you have insufficient evidence" or "it has not an immediate safety concern". Whatever that means. I know from history these nuclear plants and the agency, they just might not put the information down on paper or restricting the information from me. Hiding information to the outsiders is in the expressed purpose to not hold themselves up to their own rules and code. To withhold information from a guy like me and prevent me from participating in a fair government process and proceedings. And a guy like me makes the agency and nuclear plant stronger and safer.

From:

"Hughey, John" <

John.Hughey@nrc.gov>

To:

'Michael Mulligan' <

steamshovel2002@yahoo.com>

Sent:

Tuesday, June 12, 2012 3:10 PM

Subject:

RE: Peach Bottom 2.206 Petition Request

"You expressed that the material facts of the seal (the temperature duration in radiation for example) had not been established through testing. Therefore, the NRC staff could not prove to you that the Buna-N threaded seal material is adequate for accident conditions as well as normal operating conditions. You also expressed that you felt that the NRC staff's safety determination was merely "throwing engineering language" at you instead of addressing your concerns."

Japan Utility Agree Nuclear Crisis Was avoidable

For First Time, Tokyo Electric Says it Didn't Implement Some Safety Measures for Fear of Political, Economic Consequences

"There was a worry that if the company were to implement a severe-accident response plan, it would spur anxiety throughout the country and in the community

where the plant is sited, and lend momentum to the antinuclear movement," Tepco said in a report, explaining what it described as the "underlying reasons" the company didn't have an adequate plan in case of such accidents.

The below sounds familiar with the unqualified and 200 degree F actuators in the containment, when the need is 360 degree F actuators.

The task force said TEPCO had feared efforts to better protect nuclear facilities from severe accidents such as tsunamis would trigger anti-nuclear sentiment, interfere with operations or increase litigation risks. TEPCO could have mitigated the impact of the accident if it had diversified power and cooling systems by paying closer attention to international standards and recommendations, the statement said.

This is the well trodden path for the nuclear industry with the dumified news organizations. It is called engineering certainty/ uncertainty gaming...they get to selectively choose an issue's apparent report certainty or uncertainty. Oh well, the bad news data for us is unreliable or turn a good news questionable assumption into absolute certainty. This kind of corruption is all over the USA nuclear industry. You know, if campaign contribution congress dictates it is safe, then everyone is forced to say it is safe.

The report largely repeated findings from previous outside studies of the Fukushima Daiichi accident and its causes. Tepco didn't take further measures to prevent severe accidents after a series of upgrades it made in 2002, the report points out. The company determined that a massive tsunami wouldn't hit the plant, but it didn't have enough data to reliably come to that conclusion, the report said.

The nuclear village was a USA invention....it was imported into Japan by us.

But the admission, an apparent bid to inspire confidence, also seemed to confirm one of the main arguments of the company's critics: that it refused to recognize and fix problems because it did not want to jeopardize the so-called safety myth that Japan's nuclear technology was infallible.

I am requesting a 2.206 petition on Peach Bottom and Vermont Yankee nuclear power plants. I am also requesting a petition at any other plant on any secret but known internally...any component, system or part in a safety system that is not designed or qualified for the accident containment requirements (inside the containment of a nuclear reactor)...like the highest containment temperature or radiation.

Fort Calhoun LER 2012-017 dated 9/24/12:

While performing an extent of condition review associated with the adequacy of air operated equipment inside containment to withstand containment main steam line break (MSLB) and loss of coolant accident (LOCA) temperatures, it was discovered that valves HCV-238 (Reactor Coolant System (RCS) Loop 1a Charging Line Stop Valve), HCV-239 (RCS Loop 2a Charging Line Stop Valve), and HCV-240 (Pressurizer RC-4 Auxiliary Spray inlet Valve) have nitrile based elastomers for the air filter regulator and actuator and may not be able to withstand Containment MSLB and LOCA temperatures. The design temperature limit for the nitrile elastomers used in the valves is 180°F which is acceptable for the normal operating conditions inside Containment of 120°F. However, during the MSLB and LOCA accident the temperature inside Containment is analyzed to reach 370°F. Since these valves have both open and close functions supported by an air accumulator, failure of the nitrile based elastomers could prevent the valves from fulfilling their intended safety function.

This condition is being submitted pursuant to: 10 CFR 50.73(a)(2)(v)(D), Any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident.

Per a conversation with a Peach Bottom resident inspector, he said LOCA containment temperature inside BWR's are expected to reach 340 degrees F. He also said Exelon was going to replace those actuator seals with 400 degrees F material much like Vermont Yankee's has now in PB's upcoming outage. The inspector said, "I do have a issue with these actuators not being able to perform their safety function in a accident environment of greater than 340 degrees F." So was the old actuator and seal qualified for 360 degrees and is the new whole actuator qualified for accident environments?

Fort Calhoun LER

2012-017 : "while performing an extent of condition review associated with the adequacy of air operated equipment inside containment to withstand containment main steam line break (MSLB) and loss of coolant accident (LOCA) temperatures..."

If Exelon-Peach Bottom or Entergy-Vermont Yankee were legitimate professional engineering nuclear operators, they would have immediately flipped their not qualified SRV actuator buna-n seal problem into an "extent of condition" investigation. I'll bet you they would have found other actuators not qualified for their containment accident environment in their facilities much like Fort Calhoun. They could have warned all of the industry with these kinds of problems.

Fort Calhoun LER 2012-017: "it was discovered that valves have nitrile based elastomers for the air filter regulator and actuator and may not be able to withstand Containment MSLB and LOCA temperatures..."

So specially what unqualified components are they talking about at Fort Calhoun inside the valve(s) actuator "air filter" and "actuator"? Something like the seals and gasket material. The implications are the unqualified parts who can't withstand accident temperatures are much wider than the Peach Bottom and Vermont SRV actuator seals.

This is from Vermont Yankee Inspection 12011008. This proves VY, Peach Bottom and the NRC knowingly and secretly violated *CFR 50.73(a)(2)(v)(D)*. The actuator should have been qualified to 360 degrees F and this is a obscene violation of postulated accident conditions the plant is suppose to be designed too. This is a Fukushima once the containment cross 200 degrees F. The agency's professional nuclear engineers knew the actuators would fail really early in high temperature containment accident and they just played dumb like they didn't understand me. The agency corruptly deferred to the normal operational consideration in the answer to me, when they knew I was terrified about the actuators not meeting the accident maximum temperature operability requirements. Their nuclear engineering professionalism is supposed to be way beyond this. Once they see a 210 degree material they are suppose to flip it into can the actuator survive accident conditions.

I suspect the agency was covering-up widespread nuclear power plant accident quality assurance problems in the industry and large scale inoperable of last ditch nuclear safety air actuators not being able to mitigate the consequences of their most limiting accident. This questions the honesty of all your Fukushima responses and corrective action. Does the agency even know what is important in a postulated severe nuclear accident?

"During RFO27, Entergy discovered that the SRV Vendor no longer supported the Type-1 SRV actuators which VY had. The vendor recommended replacing the Type 1 actuators with a Type 2 actuator. The Type 1 actuator has silicone thread sealants which are rated up to -390 degrees F while a Type 2 actuator uses BUNA-N polymer which is rated up to 210 --250 degrees F."

Functionally, both Vermont Yankee and Peach Bottom have been operating secretly with components in a grossly unsafe *"condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident"*. I suspect this is a problem with not having the right off the self commercial quality valve air actuator of the right quality...so they accepted a illegal and inferior lesser quality components to continue to operate. As Vermont Yankee said, the contractor jumped them out of the blue with they don't have the accident quality actuators.

Two hundred and ten degree actuators would fail amazingly fast in an environment expected to reach three hundred and forty degree.....with not excess margin of safety. I don't care if you have a infinite supply of nitrogen...you can't prove to me they will last and operate as expected in the design accident temperature. The agency has no science and engineering studies on these 210 degree actuators proving the operability of these actuators in extreme radiation or 360 degree temperature environment.

I can hear the agency in the 2.206 process saying next; mike, you have no proof the 210 degree actuator will fail in a expected accident environment of 360 degree F. Or the accident is so extremely improbably, even if we got regulations prohibiting it...it will never be a immediate concern of the agency.

You got to know, if the actuator seals were only 210 degree F qualified and thermally degrading after a few years as in both VY and Peach Bottom at less than 180 degrees...these guys are going to fail at a really low temperature. I suspect the wiring insulation and other plastic and rubber like materials are only qualified to the 210 degree limit. Who knows what the plants would do in a extreme radiation field and 360 degree temperature. They are not qualified for 360 degrees F like they are supposed to be for public protection. From the opening stages of VY finding thermal degradations in their SRV actuator seals under normal a operational regime, they should have declared a CFR 50.73(a)(2)(v)(D) violation and entered tech specs fearing what the hell would they do in a 360 degree F environment or worst.

Not doing the below investigations constituted creating a cover-up by the NRC and allowing the plants to operate knowingly with unsafe components with inoperable safety functions in my Peach Bottom Jan 24 2012 petition. It begs to ask the question, could you even trust the utility to do a honest RCAR or the NRC to do a honest special or AIT investigation! Who do you trust?

1) Have Peach Bottom do a outside detailed investigation and root cause.

2) The NRC do a special investigation or equivalent...with contrasting and explaining the similarities and differences between Vermont Yankee and Peach Bottom SRV actuators and seal problems.

3) Need a generic notice on this?

4) That Peach Bottom nuclear plant be immediately shutdown.

5) All safety relief valve seals and actuators be replaced with a design with a sufficient margin of safety before start-up (including accident conditions).

This is an example how the 2.206 process and MD 8.11 procedure facilitates an obscene injustice to a petitioner and the community. It is gross language corruption....it is a cover-up. They can bend around the meaning of words and rules to the whims of the moment for a individual's or groups wants and needs. I guess they wanted to limit the number of people in the cover-up.

NRC Perform a Special Investigation (or Equivalent) and Explain the Similarities and Differences Between the Vermont Yankee and Peach Bottom Safety Relief valves.

Valve Actuators and Seal Problems In accordance with MD 8.11, this request does not meet the criteria for review because you did not provide sufficient facts to warrant further inquiry and therefore, this request is not accepted for review, pursuant to 10 CFR 2.206.

With Peach Bottom replacing 210 degree actuator seals and unqualified activators with 400 degree material per the resident inspector going into actuator, this constitutes a violation of CFR 50.73(a)(2)(v)(D) right now. This wording constitute gross professional engineering negligence...it is a enormous cover-up widespread illegal falsification of documents considering all the signatures on paperwork with this in the agency and the utilities.

All these officials had information available and apparent that these plants couldn't meet accident safety functions and should have tripped into tech spec requirements of a shutdown. This constituted all ADS valves were and are inoperable, and a common mode failure. And all these plants' failed to declare a 10 CFR 50.73(a)(2)(v)(D) and the NRC failed to enforce its own regulations. It constituted a wide spread industry conspiracy with covering up obscenely not safe nuclear power plants in containment accident conditons like at 360 degrees. Really, this symbolizes as a nation, the NRC doesn't have the integrity to oversee and regulate the operation of our nuclear power plants.

It has come to may attention there has become widespread discussion within the NRC about the implications of my first Peach Bottom SRV 2.206 according to the resident inspector. I am irked as hell I don't get any credit for this in NRC paperwork. I get it, the agency solely controls the credibility of any outsiders and restricts the credit of raising questions the NRC or the industry did not raise.

This condition is being submitted pursuant to: 10 CFR 50.73(a)(2)(v)(D), Any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident.

The below is how Michele G. Evans gives me a final 2,206 answer...this constitutes gross engineering professional nuclear safety negligence. She didn't have the courage to answer if the valves met their accident design intent...could they survive and function in the worst accident of record for the containment. I suspected there are many more actuators and other components in the containments throughout the industry who could not meet their accident operability temperature and radiation intent.

You get it, your have to pose a nuclear engineering question in a "never obtainable utterly perfect written or language form". This gives the NRC the excuse to reject any and all safety problems even if it is legitimate because the agency made a mistake in interpreting a petitioners words. A honest member of the public can never get on the other side of this "never obtainable utterly perfect written or language form". And these guys never disclose what the perfect form is.

September 4, 2012 -"The PRB denied the request for immediate action because there was no immediate safety concern to the plant. or to the health and safety of the public. The NRC reviewed the licensee's evaluation and actions related to this matter and concluded that the 3-ADS-SRV 71 B degraded seal condition was not caused by improper maintenance practices. Also, trend data did not indicate a potential degradation in that the same seal material had been used at PBAPS Units 2 and 3 for the last 20 years with no other failures. These facts support the conclusion that the failure of the 3-ADS-SRV 71 B threaded seal was not a common mode failure, or an age-related failure. but was isolated to the particular seal installed in November 2010. The inspectors assessed the risk associated with the issue by using Inspection Manual Chapter 0609, Appendix G, "Shutdown Operations SDP [Significance Determination Process]." The 3-ADS-SRV 71 B is one of the five PBAPS Unit 3 ADS reactor vessel relief valves. In order to perform the

ADS system safety function, four of the five ADS SRVs are required to function. The four other ADS SRVs passed the leakage test, and would have been capable of depressurizing the reactor pressure vessel for design basis events. Therefore, during the period that the 71B SRV was inoperable, the overall ADS safety function was maintained. The NRC staff's evaluation of this issue has been documented in Inspection

Report 05000277/20120003 and 05000278/2012003, dated August 14, 2012 (ADAMS Accession No. ML 12227 A323)"I might make the case the industry is playing word games with identifying defects in rubber like material such as buna, buna-n and nitrile.

Per a recent conversation with Mr. Hughey, he was forced to flip this into a official NRC allegation because I was making accusations of NRC official wrongdoing. I have less than zero faith in the integrity of the Allegation process.

As a warning, systemic and long term problems with controlling equipment reliability like this is usually a deep hole for an organization to climb out of. It usually is driven by inadequate resources and budget starvation. The plant people tell upper management the limited budget is being deeply felt on the plant reliability and human level...but it usually takes a set of serious plant accidents and the NRC to break the trance. The deep hole of TVA's Browns Ferry speaks of "minimalist approach" and Entergy Palisades speaks "putting power production above safety" and "just meeting minimum regulatory intent". We are just waiting for Fort Calhoun's excuse is. The system allows these utilities to secretly dig a humongous hole for themselves that takes years to correct.

The inspectors reviewed a list of approximately 6,791 IRs that PBAPS initiated and entered into the CAP action tracking system (Passport) from

December 1, 2011 through May 31, 2011.

I can not even begin to tell you how dangerous this is for the agency and the nuclear plants in our nation. Can you believe the agency is "one and a half to two years behind on the adverse equipment reliability trend reports. Usually these internal reports are junks anyways. It no wonder Browns Ferry, Palisades and Fort Calhoun get so far behind the eight ball and are a embarrassment to our nation. Its like trying to drive your car though three sets of rear view mirrors and you are not allowed to drive out of the front windshield. This is what is wrong with the agency...why Entergy-Palisades and TVA-Browns Ferry problems are so intractable. The agency should be reporting in inspection reports on the CAP and CR reports trends on the last quarters.

This is very dangerous territory we are talking about if all the nuclear plants defer to the "minimalist approach", "placing power production over safety" and "just meeting the minimum regulatory intent". You give me access to those CAP reports and trends on a nation wide bases, I will transform the whole nuclear industry into something the nation can trust. After this year's mid west drought for Exelon, I'd put on that list of the "minimalist approach" to heat sink cooling.

Did I mention about the agency i think the NRC Office of Investigation section is brain dead and effectively powerless to change utility behavior. They are just paper shufflers who don't change behavior. I think we got a widespread and long list of events where the agency just hasn't turned nuclear plant behavior around. They more facilitated bad behavior by paper macheing over problem until they get big like Fort Calhoun, San Onofre, Browns Ferry and Palisades.

August 14, 2012

EA-12-094

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION - NRC INTEGRATED INSPECTION REPORT 05000277/2012003 AND 05000278/2012003, NRC OFFICE OF INVESTIGATIONS REPORT 1-2012-011, AND EXERCISE OF ENFORCEMENT DISCRETION

The inspectors performed a detailed review of items entered into the CAP to identify trends (either NRC or licensee-identified), and develop insights into PBAPS's progress in identifying and addressing themes. The inspectors reviewed a list of approximately 6,791 IRs that PBAPS initiated and entered into the CAP action tracking system (Passport) from December 1, 2011 through May 31, 2011.

The inspectors performed a detailed review of items entered into the CAP to identify trends (either NRC or licensee-identified), and develop insights into PBAPS's progress in identifying and addressing themes. The inspectors reviewed a list of approximately 6,791 IRs that PBAPS initiated and entered into the CAP action tracking system (Passport) from December 1, 2011 through May 31, 2011.

PBAPS has identified a continued adverse trend in the area of equipment reliability. During the review period, the inspectors noted that PBAPS has performed six causal investigations related to the area of equipment reliability:

- An apparent cause analysis was performed under CR 1294916 in response to multiple examples of station management not driving thorough diagnosis and efficient resolution of equipment issues.*
- A common cause analysis was performed under CR 1317314 to evaluate if any equipment reliability programmatic deficiencies exist at the station, in response to 21 equipment apparent cause evaluations between January 1, 2011 and February 2, 2012.*
- An apparent cause evaluation was performed under CR 1345680 to analyze multiple examples of slow management response to resolve degraded equipment issues.*
- A root cause analysis was performed under CR 1359373 to analyze weaknesses in the station's response to and management of degraded equipment issues.*
- A common cause analysis was performed under CR 1361089 to analyze five NRC findings with cross-cutting components in the CAP area, related to degraded equipment or equipment failures, from the second quarter of 2011 through the first quarter of 2012.*
- A common cause analysis was performed under CR 1372563 to investigate emergent clearances written during the first half of 2012 which identified that sixty percent were written as a result of equipment failures.*

Additionally, during the previous semi-annual review period, as documented in NRC Inspection Report 2011-005, Section 4OA2.3, the inspectors identified an adverse trend in the area of equipment reliability.

Of course, fraud, lying, deception and dishonesty...selective truth telling for a agenda of self over national interest...is only what the agency and the political system that supports it says it is.

Request

1) That Peach Bottom one and two be immediately shutdown for safety reasons based on the common mode failure of the SRV activators not being qualified for the licensed accident containment max temperature and radiation conditions. Basically Peach Bottom-Exelon is not honest enough to be operating any nuclear reactor. Their actuators would fail grossly early in the most limiting accident with their containments substantially below 360 degrees F accident temperatures. I suspect the actuator would fail at 200 degrees F instead of 360 degrees F as

required by plant license. I believe the requirement is components who could survive 360 degrees for the accident time limit plus a margin of safety.. That is why now Peach Bottom are moving to replacing their SRV actuators with buna-n seal materials that would survive 400 degrees F. I don't know if the new actuators are qualified. I don't know per Fort Calhoun actuators if other containment safety actuators or other components are involved.

I believe unit 2 has just through a outage and 3 has yet to have on...but who the hell knows what is going on with their actuators....

2) That Vermont Yankee-Entergy be fined \$10 million dollar for not declaring a 10 CFR 50.73(a)(2)(v)(D) on their SRV actuators....they did not warn the other plants of these problems.

3) Request a Department of Justice/ FBI investigation of these events. The agency NRC Enforcement cronies and OIG just blew by this.

4) An investigation nationwide with equipment and components not being accident qualified in any nuclear plant containments especially max temperatures and radiation...they should be shutdown immediately to acquire and install the appropriates grade of nuclear accident safety equipment. Is the wiring insulation or any of the rubber like material (buna and nitrile)qualified for 360 degree F or the extreme radiation environments?

5) Request the formation of a local public oversight panel around every plant.

6) A emergency NRC senior official oversight panel with the aims of reforming the ROP.

7) A national NRC oversight panel of outsiders to oversee and report on the agency's activities. There should be a mixture of professional academic people and capable lay people.

8) Request massive reforms within the 2.206 system and their directives. This system doesn't serve the public and their communities...it serves the agency and protecting the nuclear village industry. This doesn't make our nation greater, it demeans a great nation like ours. It is at the root with why there is no growth in the industry and most of their plants have grown obsolete.

9) I request a \$10 million dollar fine to Peach Bottom, because even with prompting, they failed to submit and comply with *10 CFR 50.73(a)(2)(v)(D)*.

Sincerely,
Mike Mulligan
Hinsdale, NH
16033368320