

FOIA Resource

FOIA/PA REQUEST

Case No.: 2015-0393

Date Rec'd: 7/17/15

Specialist:

Related Cases:

From: David Lochbaum <dlochbaum@ucsusa.org>
Sent: Friday, July 17, 2015 8:29 AM
To: FOIA Resource
Subject: WWW Form Submission

Below is the result of your feedback form. It was submitted by

David Lochbaum (dlochbaum@ucsusa.org) on Friday, July 17, 2015 at 08:29:23

through the IP 209.170.118.134

using the form at <http://www.nrc.gov/reading-rm/foia/foia-submittal-form.html>

and resulted in this email to foia.resource@nrc.gov

Company/Affiliation: Union of Concerned Scientists

Address1: PO Box 15316

Address2:

City: Chattanooga

State: TN

Zip: 37415

Country: United_States

Country-Other:

Phone: 423-468-9272

Desc: ML14231B281, ML14231B282, ML14231B293, ML14231B295, ML14231B300, ML14231B302, ML14231B303, ML14259A593

FeeCategory: Educational

MediaType:

MediaType_Other_Description:

Expedite_ImminentThreatText:

Expedite_UrgencyToInformText:

Waiver_Purpose: The requested documents (apparently already in ADAMS but coded non-public) are references in TIA 2014-04 (ML14311a862) that UCS obtained via FOIA-2015-00384. UCS seeks the

requested records to supplement our understanding of the degraded voltage relay protection issues discussed in TIA 2014-04.

Waiver_ExtentToExtractAnalyze: UCS will review the requested records, along with TIA 2014-04 and the 2014 CDBI report, to understand degraded voltage relay protection at Oconee versus regulatory requirements.

Waiver_SpecificActivityQuals: UCS has monitored degraded voltage protection issues at a number of plants. For example, our "Futility at the Utility" report documented Fermi Unit 2 operating for 20 years with non-conservative degraded voltage protection acceptance criteria in its test procedures. We later chronicled the NRC's finding that degraded voltage protection at Hatch was inadequate. This Oconee example adds to that series. The wrinkle we will pursue is how operating experience from the Fermi, Hatch and other plants did not result in Duke or the NRC discovering the degraded voltage problems at Oconee until 2014.

Waiver_ImpactPublicUnderstanding: Degraded voltage relay protection issues are technical and complex. UCS strives to communicate the safety reasons for this protection, how the protections work, and what was inadequate in the identified problems that needed to be corrected. While documents like the 2014 CDBI report are publicly available, they are not written for a public audience to understand.

Waiver_NatureOfPublic: UCS's commentaries and reports reach a sizeable audience. We conduct hundreds of emails annually and our website (www.ucsusa.org) gets thousands of hits each week.

Waiver_MeansOfDissemination: UCS uses commentaries posted to our AllThingsNuclear.org blog as well as short reports, fact sheets, issue briefs, and long reports posted to our www.ucsusa.org website to communicate our findings. In addition, we participate in dozens of public presentations annually on nuclear safety issues. UCS will likely use several of these communication outlets to discuss our views on the degraded voltage relay protection issues at Oconee.

Waiver_FreeToPublicOrFee: Materials posted to our blog and website are available for viewing/downloading for free. UCS very rarely agrees to participate in public presentations that charge an admittance fee -- and in those rare cases, the fees are collected by the host entity and UCS does not receive a penny from that collection.

Waiver_PrivateCommercialInterest: None
