

## IPRenewal NPEmails

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**From:** Sheehan, Neil  
**Sent:** Friday, April 15, 2016 7:37 AM  
**To:** Gray, Mel; Dentel, Glenn; Pickett, Douglas  
**Subject:** Media questions re: IP2 bolts

Your thoughts?

**From:** Willboisvert  
**Sent:** Friday, April 15, 2016 4:09 AM  
**To:** OPA1 RESOURCE ; Sheehan, Neil  
**Subject:** [External\_Sender] Question about Indian Point baffle bolt inspections

I'm a journalist writing about the baffle bolt issue at Indian Point. I'm referring to an article by David Lochbaum at Union of Concerned Scientists, where he seems to attribute the inspection of baffle bolts undertaken by Entergy at IP2 to pressure from the State of New York's contention to IP's license renewal before the ASLB.

Here are excerpts from Mr. Lochbaum's article below (<http://allthingsnuclear.org/dlochbaum/kudos-to-cuomo-new-york-helps-prevent-degraded-bolts-from-leading-to-nuclear-disaster>) Is his article a fair representation of NRC's 2011 decision to impose MRP-227 as the standard for the reactor internals part of aging management plans?

*"Workers recently discovered that more than a quarter of the [bolts holding the core former and core baffle plates](#) together inside the Unit 2 reactor vessel at Indian Point in Buchanan, New York were degraded and required replacement. The bolts had not been routinely inspected since the reactor began operating in the mid-1970s. And the bolts may not have been inspected this year but for the efforts of the state of New York.*

*Degraded bolts could have serious nuclear safety consequences. The bolts hold together metal plates that direct cooling water flow through the reactor core. Degraded bolts could allow plates to gap or even separate, providing pathways for water to bypass the reactor core, potentially leading to a meltdown.*

### ***What led to this important inspection?***

*Indian Point's owner [applied](#) to the U.S. Nuclear Regulatory Commission (NRC) in 2007 for a 20-year renewal of the operating licenses for the Unit 2 and 3 reactors. The state of New York, through the Office of the Attorney General, [intervened](#). Among other things, New York contended that the aging management program for the reactor vessels and their internal components (including the bolts) was inadequate. **The owner and the NRC initially disagreed with New York, contending that existing inspection programs were sufficient.** New York defended its contention during the license renewal proceeding before a three-person Atomic Safety and Licensing Board formed by the NRC. The proceeding is ongoing, but New York's defense was so compelling that in July 2010, the owner sent the NRC an [amendment to its license renewal application](#) committing to inspect the reactor vessels and their internal components using a standard developed by the Electric Power Research Institute (EPRI). Workers using this [EPRI standard](#) inspected the former-baffle bolts on Unit 2 last month and discovered significant degradation.*

*The NRC also changed its tune. In July 2011, it notified owners of all other pressurized water reactors in the United States like those at Indian Point that they would have to follow the EPRI standard in the aging management of reactor vessels and their internal components. The NRC even required the reactors it had already relicensed to apply this EPRI standard.”*

--So, by Mr. Lochbaum's account it sounds like Entergy resisted an adequate reactor internals program, and that NRC supported Entergy, but then New York's counter-arguments were so "compelling" that Entergy volunteered to institute MRP-227, which required it to perform the inspection that found the degraded baffle bolts. Without pressure from NY, no baffle bolt inspections. It also sounds like NRC would not have imposed MRP-227, and therefore the baffle bolt inspections, without NY state pressure.

But then I read the IP LAR Mr. Lochbaum referenced, and it seems to show that Entergy was already anticipating a reactor internals program like MRP-227 when it filed its LRA in 2007, and had already flagged baffle bolts as requiring attention. EPRI finished MRP-227 in December, 2008 (an Entergy employee was on the group that wrote it), so it seems plausible that MRP-227 was in the works when Entergy filed the original LRA in 2007, and that both Entergy and NRC were anticipating then that MRP-227 would set the standard for the reactor internals part of IP's AMP. **In that case Entergy's and NRC's accession to MRP-227, and the IP baffle bolt inspection, would not have been caused by pressure from NY state, but would have been the outcome of a long-planned regulatory process.**

Much obliged if you can set me straight on what the real story behind MRP-227 and the baffle bolt inspections is.

Yours,

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