

From: Guzman, Richard
Sent: Thursday, July 07, 2016 11:53 AM
To: 'dlochbaum@ucsusa.org'
Cc: Pickett, Douglas
Subject: UCS petition regarding baffle bolt degradation at Indian Point

Mr. Lochbaum,

We have received your subject 10 CFR 2.206 petition dated June 30, 2016, concerning baffle-former bolt degradation at the Indian Point Nuclear Generating Unit Nos. 2 and 3. Mr. Doug Pickett will be the assigned petitioner manager for your petition. For your information, Doug and I both work in the same branch at the NRC and we frequently back each other up. While Doug will serve as your primary contact, I can also be reached for any 2.206 process questions; I may also be assisting Doug with other project manager responsibilities regarding your petition.

Section 2.206 of Title 10 of the Code of Federal Regulations describes the petition process – the primary mechanism for the public to request enforcement action by the NRC in a public process. This process permits anyone to petition NRC to take enforcement-type action related to NRC licensees or licensed activities. Depending on the results of its evaluation, NRC could modify, suspend or revoke an NRC-issued license or take any other appropriate enforcement action to resolve a problem. The NRC staff's guidance for the disposition of 2.206 petition requests is in [Management Directive 8.11](#), which is publicly available.

The 2.206 process provides a mechanism for any member of the public to request enforcement action against NRC licensees. The 2.206 process is separate from the allegations process which affords individuals who raise safety concerns a degree of protection of their identity. In the 2.206 process, all of the information in your petition will be made public, including your identity. Also, as you are aware, the petitioners have the opportunity to address the NRC Petition Review Board (PRB) to further discuss their petition, either in person at the NRC Headquarters in Rockville, MD, or by telephone conference. In your petition, you requested a teleconference with the PRB to highlight the enforcement actions requested and to provide any clarifications for the PRB before it convenes to review the petition. The following are dates and times that members of the PRB would be available for a presentation of approximately one hour.

- Tuesday, July 26, between 2 and 4 p.m.
- Thursday, July 28, between 1 and 3:30 p.m.
- Friday, July 29, anytime during the day

I would appreciate if you could advise me (and Doug Pickett) by noon on Friday, July 15, 2016, your preferred dates for the conference call. Doug will coordinate the meeting details and provide you a bridgeline dial-in number. As stated in Management Directive 8.11, a transcript of the presentation will be treated as a supplement to your petition and it will become publicly available.

If you have other questions on the 2.206 process, or regarding the role as petition manager, please contact me or Doug Pickett at 301-415-1364.

Thank you,

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Rich Guzman  
Sr. PM, Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Office: O-8E10 | Phone: 301-415-1030

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**From:** Dave Lochbaum [<mailto:DLochbaum@ucsusa.org>]  
**Sent:** Thursday, June 30, 2016 11:09 AM  
**To:** McCree, Victor M <[Victor.McCree@nrc.gov](mailto:Victor.McCree@nrc.gov)>  
**Cc:** SCRENCI, DIANE P <[Diane.Screnci@nrc.gov](mailto:Diane.Screnci@nrc.gov)>  
**Subject:** [External\_Sender] UCS petition regarding baffle bolt degradation at Indian Point

Dear Mr. McCree:

Attached is a petition per 10 CFR 2.206 submitted on behalf of the Union of Concerned Scientists requesting that the NRC take three enforcement actions regarding to baffle bolt degradation at the Unit 2 and 3 reactors at Indian Point.

As detailed in the petition, UCS requests that the NRC:

- 1) Issue an Order requiring Entergy to re-inspect the Unit 2 baffle bolts during the next refueling outage and also to implement the downflow to upflow modification during that same outage.
- 2) Issue a Demand for Information requiring Entergy to conduct and submit an Operability Determination for operating Unit 3 without baffle bolt inspections despite high likelihood of baffle bolt degradation, too.
- 3) Issue a Demand for Information requiring Entergy to explain the role and operating history of the Metal Impact Monitoring System installed to detect noises made by loose metal parts banging around the reactor coolant system.

UCS does not plan to also mail in a hard copy of this petition, but will do so upon request.

Thanks,  
David Lochbaum  
Director, Nuclear Safety Project  
Union of Concerned Scientists  
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Check out the UCS blog on nuclear weapons and nuclear power issues at  
<http://allthingsnuclear.org/>

