

**ADAMS ACCESSION NO. ML17012A308**

**From:** Michael Mulligan [<mailto:steamshovel2002@yahoo.com>]

**Sent:** Thursday, January 12, 2017 10:08 AM

**To:** Barkley, Richard <[Richard.Barkley@nrc.gov](mailto:Richard.Barkley@nrc.gov)>

**Subject:** [External\_Sender] Re: Nice speaking with you again today regarding Hope Creek

Richard,

This is a cover-up as illuminated by the NRC and Hope Creek... in they won't describe the troubles with bringing on better designed valves and the weaselly and slippery words you both use.

A perfect Truism: First they corrupt language, then the accident happens!

In a court of law or court of public opinion, I'd ripped the NRC's credibility to shreds with your own documents or lack of appropriate documentation. The fundamental research and studies understanding the process of corrosion bonding on SRVs is sadly lacking. I think this is on purpose. Remember there is tremendous amount of energy and forces going through the SRVs when fully open and a relatively small dp from shut to full open with the pilot valves. Where in the FSAR or any reference material does the document allow\describe having the SRVs and S/RV system be both inop and safe at the same time? The word inop has a special definition for the NRC. This is an unapproved drastic change to the facility...you created an unapproved operating region without the documentation to prove it is safe.

**Browns Ferry Nuclear Plant Unit 3**

**Licensee Event Report 50-296/2016-004-00**

"TS 3.4.3 requires twelve of the thirteen S/RVs to be operable for S/RV system operability. The three failed MS RVs rendered the entire S/RV system inoperable for the duration of the fuel cycle, from March 19, 2014 to February 20, 2016."

"The two-stage pilot valves **failed** due to the valve disc corrosion bonding to the valve seat."

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Today you described the rate corrosion bonding as stable and predictable ("What if 10 SRVs set pressure is greater than 10%".. But the OE says the corrosion rate is totally unpredictable. I'd sure like to see that OE. The NRC has been giving me inaccurate and incomplete information surrounding Hope Creek hoping to throw me off track.

1) I asked you if Hope Creek has an undisclosed SRV now who is inop? You never answered that question. Hope Creek should be shutdown right now because more than one SRV is inop and failed.

2) You implied Hope Creek with the SRVs upon start-up always begins with a clean state absent any historic record. The NRC expects there to be no setpoint drift during the operating period. This assertion is called regulatory and engineering malpractice.

3) You said the target rock SRV issues are highly sensitive to the NRC implying everyone knows a cover-up is ongoing. There are potentially a generic issues affecting more than one plant.

4) I asked you how does the NRC explain the fifteen year old trend of zero, one or two fail valves and it slowly trending up to ten valves twice in a row today?. Again the passive-aggressive syndrome non answers. It is violence against transparency and contrary to the meaning of our Constitution. Remember a few years back they weaken the pressure setpoint testing from plus or minus 1% to today's plus or minus 3% (a regulator accommodating these defective valves through campaign contribution). That is a 200% weakening of the setpoint lift testing and it drastically shot up to now ten valves failing the last two cycles. It looks really bad on the raw data in the new LER....but it is really really bad if today's 3% inop rate was normalized to 1%. It is a short term drastic change in corrosion bonding rate.

5) You implied the SRV were safe because when the corrosion bonded valves are tested, when it immediately is retested, it comes back to the original setpoint. It is the essence of the NRC gives selective information to support an illegal agenda of the agency. I asked, well why don't you make the licensees cycle the valve one a month so they can break corrosion bonding and return it to original setpoint lift. Again, the deafening sound of a passive/ aggressive violent silence of a non-answer ("Mike, this is really a sensitive issues for the NRC.) These valves are notorious for leaking once the corrosion bonding is broken (normal valve cycling) and ends up requiring a shutdown do to a leaking SRV. It is profits and buddies over safety!

"On March 18, 2014, all thirteen BFN, Unit 3 MSRVs were replaced with refurbished valves which were certified to lift within +/- 1 percent of their setpoint. Industrial operating experience (OE) has shown that Target Rock two-stage MSRV setpoint drift is not a uniform, linear process. The corrosion bonding increases at a random rate. Without an accurate and reliable model for predicting or estimating the setpoint drift development, the point in time where the setpoint exceeded the +/- 3 percent limit cannot be reliably determined."

I called your boss and left a recording wondering if I could have a discussion about this today like we discussed. I wonder if information is being kept from your senior management?

I think this thing all is a illegal accommodation to the fact that Hope Creek can't get any manufacturer (at any price) to supply new valves to the plant or any junk Target Rock SRVs based on liability issues with the manufacturer. As you know, there are similar valves out in the market who have no history of set point drift. Instead, Hope Creek is stuck with crappy vendor services, maintenance and testing...

I talked to Hope Creek's licensing manager over this. I think Hope Creek and Salem are generally declining perilously and the NRC doesn't have the tools to stop to the decline (put a floor on it) until a big event shows up. The agency can't anticipate and act on the decline of a plant, congress only enables the NRC to get involved in changing the behavior of the organization once the organizational dysfunction is intractably entrenched in the enormous organization. Is your Indian Point moment approaching? Collectively the NRC and Hope/ Salem site and staff's are "overwhelmed" and underfunded in the second largest nuclear facility in the USA.

I remind everyone Hope Creek needs 15 of 16 SRVs to be operability in order to remain up at power. There isn't a lot of excess slack in this system.

Could you put this e-mail in Hope Creek's docket?

Sincerely,  
Mike Mulligan