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1 ALSO PRESENT:

2 PAUL BLANCH, Citizen Stakeholder

3 TINA BONGAR, Resist Spectra

4 MICHEL LEE, Council on Intelligent Energy and

5 Conservation Policy

6 STEVE NANNEY, Pipeline and Hazardous Materials

7 Safety Administration, DOT

8 AMY ROSMARIN, Stop the Algonquin Pipeline Expansion

9 SUSAN VAN DOLSEN, Stop the Algonquin Pipeline

10 Expansion

11 NANCY VANN, Safe Energy Rights Group

12 ELLEN WEININGER, Grassroots Environmental Education

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P R O C E E D I N G S

1:02 p.m.

MR. SKEEN: Hello, this is Dave Skeen. This is the 1:00 call to discuss the evaluation team's review of the IG findings with Paul Blanch. Who else do we have on the line?

MS. LI: Rene'e Li, from NRC.

MS. CLARK: Theresa Clark, from NRC.

MR. BLANCH: And Paul Blanch, a citizen stakeholder.

MR. SKEEN: Thanks, Paul.

MR. NANNEY: And Steve Nanney, US DOT, PHMSA.

MS. DENNIS: This is --

MR. SKEEN: Thanks, Steve.

MS. DENNIS: -- Suzanne Dennis, with the NRC.

MR. SKEEN: Okay. I don't hear others. I think with the court reporter, we should probably each state our names and spell it for him, so that he, as we're speaking, he'll know who to attribute comments to.

So, I'll go first. My name is David Skeen, it's S-K-E-E-N. And I'm the team leader for the evaluation team that's looking into the Inspector

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1 General's event inquiry.

2 MS. CLARK: This is Theresa Clark, T-H-E-R-
3 E-S-A, last name Clark, C-L-A-R-K. And I'm Dave's
4 deputy on the NRC team.

5 MS. LI: This is Rene'e Li, my official
6 name is Yueh-Li Li, spells Y-U-E-H, dash, L-I, last
7 name Li, L-I. And I'm from NRC.

8 MR. BLANCH: You're from where?

9 MS. LI: NRC, Nuclear Regulatory
10 Commission.

11 MR. BLANCH: Okay. And my name is Paul
12 Blanch, B-L-A-N-C-H, and I am the concerned
13 stakeholder that was discussed in the OIG report.

14 MS. DENNIS: Hi, this is Suzanne Dennis, S-
15 U-Z-A-N-N-E, last name Dennis, D-E-N-N-I-S.

16 MR. BLANCH: And where are you from,
17 Suzanne?

18 MS. DENNIS: Oh, I'm from the Nuclear
19 Regulatory Commission. Sorry about that.

20 MR. BLANCH: Okay.

21 MR. SKEEN: So, who else do we have? I
22 know there's other folks.

23 MS. ROSMARIN: This is Amy Rosmarin, and
24 I'm just listening. I'm with Stop the Algonquin
25 Pipeline Expansion.

1 MR. SKEEN: Okay, thank you.

2 MS. VAN DOLSEN: This is Susan Van Dolsen,
3 I'm also with Stop the Algonquin Pipeline Expansion
4 and listening. I'm going to go on mute.

5 MR. SKEEN: Thank you.

6 MS. VANN: I'm Nancy Vann, I'm with Safe
7 Energy Rights Group, and also just listening.

8 MR. SKEEN: Okay, thank you.

9 MS. BONGAR: And hi, I'm Tina Bongar, and
10 I'm with United for Clean Energy/Resist Spectra. And
11 I'm just listening.

12 MR. SKEEN: Okay. Is there anyone else on
13 the line?

14 MS. LEE: Yes, this is Michel Lee, with the
15 Council on Intelligent Energy and Conservation Policy,
16 also just listening on mute.

17 MR. SKEEN: All right, thank you.

18 MS. WEININGER: Ellen Weininger, and I'm
19 with Grassroots Environmental Education, and I'm just
20 listening. Thank you.

21 MR. SKEEN: Okay. Is that everyone? I
22 don't hear anyone else.

23 MR. BLANCH: I thought we were going to
24 have someone from New York State. Amy, you said you
25 were going to be in contact, are they participating?

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1 MS. ROSMARIN: I just, I sent them an
2 invitation and haven't heard back. I gave them the
3 call-in information. But the timing was pretty short.

4 MR. BLANCH: Yes, I know. Okay. Who wants
5 to start?

6 MR. SKEEN: Okay. Well, thanks, Paul. So,
7 let me just get the thing started here.

8 So, as I said, I'm part of a special team
9 that the Nuclear Regulatory Commission put together to
10 evaluate the Inspector General findings from the event
11 inquiry related to the 42-inch gas pipeline that runs
12 near Indian Point Energy Center.

13 I was tasked to put together a team of NRC
14 and external experts to evaluate the findings and to
15 provide a report back to the Commission within 45 days
16 on the findings, on our evaluation of the Inspector
17 General's findings.

18 And so, we have both internal experts, as
19 well as external experts, on our team that are looking
20 into the findings from the Inspector General.

21 So, with that, the purpose of this call
22 was to talk with Paul Blanch today. I know Paul was
23 the concerned individual that was involved in some of
24 the activities related to the gas pipeline and the
25 2.206 Petition that was provided to the NRC.

1 And so, we want to hear his thoughts, make
2 sure that we have all of his concerns as part of our
3 efforts, as we go forward. And so, with that, I
4 wanted to talk with Paul about, to make sure we
5 understood his concerns that he has raised thus far.

6 And I know, Paul, you had sent something
7 in to us with a draft letter that you had, and maybe
8 we should go and start with that, maybe the best thing
9 to walk through that with you.

10 MR. BLANCH: Yes. That's what --

11 MR. SKEEN: And then, we have --

12 MR. BLANCH: That's what I --

13 MR. SKEEN: -- some particular questions --

14 MR. BLANCH: -- would like, too.

15 MR. SKEEN: -- we wanted to ask as well.
16 So, if that's okay with you, and the team, I have the
17 team on the line with me, so if there are specific
18 questions or clarifications we need as you go through
19 some of your concerns, we'll try to make sure we
20 capture those as we go forward.

21 MR. BLANCH: Okay. What I -- it was a
22 draft letter, and I know anything sent to the NRC,
23 draft or not, is going to go into ADAMS. That's fine.

24 I was just trying to give you a heads-up,
25 because there were probably editorial mistakes in

1 there and so on and so forth. But the concept of the
2 letter remains the same. I do not know whether you
3 distributed it to the rest of your team.

4 MR. SKEEN: Yes, the team has seen it. I
5 forwarded that to them when you sent it, because I
6 thought it would help the discussion this afternoon.
7 So, we have at least seen it.

8 But if you wanted to walk us through, to
9 make sure we've got your concerns. I think a lot of
10 what is in your letter was already part of our
11 efforts, but I just want to be sure, as we talk with
12 you, that we've captured everything. So --

13 MR. BLANCH: Okay.

14 MR. SKEEN: -- if you want to go ahead,
15 please do.

16 MR. BLANCH: Yes, do you have anyone from
17 Sandia online? On the line?

18 MR. SKEEN: I don't believe Sandia is on.
19 I know they were doing the computer runs, but I don't
20 believe that we have them on. Suzanne, did you notice
21 if Sandia was going to be available?

22 MS. DENNIS: Hi, yes, I talked with our
23 experts from Sandia yesterday and they decided, since
24 today was being transcribed, they would look over the
25 notes and focus on getting the simulations done,

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1 hopefully before this weekend.

2 MR. SKEEN: All right, thank you. So,
3 Paul, no, we don't have Sandia with us this afternoon.

4 MR. BLANCH: Okay. Well, I sent that
5 letter just so your team could digest where I'm coming
6 from, and for those others listening to it, they have
7 not seen my draft letter, but it's my comments on a
8 official NRC document that was put out on March 18,
9 which is basically the scope of the team.

10 And I think it would be best if I just
11 read the letter and we could stop after each
12 paragraph, if there are questions. So, if that's
13 okay, to get it into the record, I know it will be
14 part of the record anyway.

15 I say in my letter, it's addressed to
16 David Skeen, it appears the team's direction is to
17 have Sandia National Labs perform a risk analysis.

18 I have no problem with this approach,
19 however, I question, quote, analyzing natural gas
20 pipeline rupture phenomena and consequences, which was
21 in Dave's outline, as the sole guidance, when there is
22 clear federal law and regulations as to how to
23 evaluate the pipeline's impact on public safety.

24 I want a structured approach for risk
25 assessment, is basically what I'm saying. And the

1 only one that we can fall back on is what is in the
2 federal law.

3 And then, I go on and state the PHMSA's
4 mission is to protect, is pipeline safety, no doubt
5 about that. NRC's mission is nuclear safety and
6 providing adequate protections to the public health
7 and safety. PHMSA does not regulate the NRC or
8 oversee the NRC, and the same way, the NRC doesn't
9 oversee PHMSA.

10 So, I go on to say, from the enclosed
11 direction, it appears the NRC is about to charter
12 Sandia to conduct yet one more risk assessment. We've
13 had risk assessments conducted by Entergy, Algonquin,
14 NRC, PHMSA, State of New York, myself, and then,
15 there's another one that got lost by the NRC that's on
16 a CD somewhere.

17 We've had enough attempts on risk
18 assessment and have everyone thinking, this is what we
19 think we need. I go on to say, there is a regulatory
20 and industry consensus of conducting a risk
21 assessment, and that is specified in 49 CFR 192.917
22 and 935.

23 This is the only generally accepted
24 guidance for conducting a risk assessment of gas
25 lines. This went through rulemaking, comments,

1 industry comments, this is the consensus of how one
2 does a risk assessment.

3 And I go on to say, quoting in my letter,
4 it is my position that the risk assessment be
5 conducted following the Pipeline Safety Act of 2016
6 and 49 CFR 192. The result must then be reviewed by
7 PHMSA for compliance with its regulations.

8 And then, the NRC, based on that risk
9 assessment, makes the determination of, quote,
10 reasonable assurance of adequate protection of public
11 health and safety.

12 I have just gone through the final
13 Environmental Impact Statement and, Steve, this is
14 probably directed at you. Steve is from PHMSA.
15 Throughout the Environmental Impact Statement, dozens
16 and dozens of times, are statement, total compliance
17 with 49 CFR 192.

18 No exceptions that I have identified.
19 Meaning that, FERC, PHMSA, EPA, in signing off of that
20 document are saying, the regulations of 192, amongst
21 others, have been met.

22 I have tried, communicated, and the reason
23 Amy and Ellen are on here, they have communicated with
24 me and with Karen Gentile of PHMSA, to attempt to get
25 a copy of the risk assessment they said was done. All

1 I got from PHMSA, and this was all in writing and
2 PHMSA has it and I think, Dave, you may have some of
3 it, all --

4 MR. SKEEN: Excuse me, Paul.

5 MR. BLANCH: -- I've gotten are --

6 MR. SKEEN: Excuse me, Paul. Did someone
7 else just come on the line.

8 MS. CLARK: That was Theresa. Somehow my
9 call dropped and now I'm back, sorry.

10 MR. SKEEN: Okay, thank you. I just heard
11 another beep, so I just wanted to make sure we knew
12 who was on the line. Thank you. Go ahead, Paul, I'm
13 sorry.

14 MR. BLANCH: Okay. So, what we have is a
15 document called the Environmental Impact Statement
16 certifying compliance with 49 CFR 192, which is, at
17 best, an inaccurate statement. And something that the
18 NRC's risk assessment may have been based upon.

19 I guess my next question is directed at
20 Steve. And by the way, Rick Kuprewicz, our common
21 associate says very good things about you. Has there
22 been a risk assessment done for the pipelines at
23 Indian Point that are in compliance with PHMSA
24 regulations? And if so, how do we get a copy?

25 MR. SKEEN: So, Steve, are you on the line?

1 MR. NANNEY: Yes, I'm listening. Dave, do
2 you want me to answer?

3 MR. BLANCH: Yes, I'd like to.

4 MR. SKEEN: Yes, if you could answer that,
5 that's fine. Like I say, that's more of a PHMSA than
6 an NRC question, I guess --

7 MR. BLANCH: Well, they're all --

8 MR. SKEEN: -- so, if you can --

9 MR. BLANCH: -- tied together.

10 MR. SKEEN: -- answer, that would be fine.

11 MR. NANNEY: Well, first of all, you're
12 asking has one been done? But I can answer you this
13 way, if you go look at Part 192, Subpart O, it has the
14 regulations of when you have to do assessments of the
15 pipeline.

16 In other words, when you've found it to be
17 a high consequence area, as defined in Part 192. And
18 --

19 MR. BLANCH: Right.

20 MR. NANNEY: -- the parent company that
21 owns the same pipeline is Enbridge. And Enbridge does
22 have a compliant integrity management program.

23 This particular line, this particular
24 location, has Steve Nanney seen the documents? The
25 answer is, no.

1 And because -- I'm listening in today,
2 I've listened in when Richard talked yesterday,
3 because my goal of listening in was to see what the
4 concerns were and to see what my takeaway would be of
5 going back and looking, since I wasn't involved in
6 this back several years ago when it was built and
7 everything.

8 So, that being said, yes, they would have
9 to have a risk assessment on that. A risk assessment,
10 by the code on the new pipeline, the first thing that
11 I would look for would be, did they do a hydrostatic
12 pressure test that met the code?

13 On a new pipeline, that would be the first
14 item to look at, to make sure. And I would be, and I
15 will be going back and asking that question.

16 The other thing, as the pipeline is put
17 in-service and time goes by, would be inline
18 inspection tools run on this pipeline, plus their
19 yearly maintenance activities and patrolling
20 activities.

21 So, to answer your question, yes, I will
22 go back and look at that. What we can actually put
23 out for the public review, I can't say right at the
24 moment what I could actually give you, until I look at
25 the records and everything.

1 MR. SKEEN: So, I appreciate that, Steve.
2 I appreciate that. And maybe, Paul, when we talk
3 about a risk assessment, are we talking about two
4 different things?

5 From an NRC probabilistic risk assessment,
6 a risk-informed process that we have, versus the risk
7 assessment for a gas pipeline may be looking at
8 different things.

9 And I know we've talked about this, what's
10 in the ASME appendix and all of that, but maybe it
11 would be good to make sure we understand, when we say
12 risk assessment, what we're talking about.

13 MR. BLANCH: Okay. This is Paul Blanch,
14 again. I'll try to explain it and, Steve, sorry to
15 put you on the spot here, because you're relatively
16 new to this.

17 But the clear requirements, Steve, in
18 Subpart O of 192 are numerous, as you know. And
19 192.917 and 934 require a very detailed risk
20 assessment. This should be outside of NRC space.

21 I would have expected, if you're
22 installing or if PHMSA is approving the installation
23 of a 42-inch line in the vicinity of two nuclear power
24 plants, that they would do an adequate risk assessment
25 and those results would be presented to the NRC. They

1 could take the results, here are the probabilities,
2 these are numbers.

3 It shouldn't be the NRC doing this, these
4 are the numbers that PHMSA should be coming up with
5 and following the regulations of ASME B31.8, and there
6 are other references, or documents, incorporated by
7 reference.

8 And this is not inconsistent -- has
9 everyone seen the letter from the Attorney General of
10 the State of New York this morning?

11 MR. SKEEN: I have seen that, yes, Paul.

12 MR. BLANCH: Yes. My request is not
13 inconsistent with what the Attorney General of the
14 State of New York is saying.

15 These are -- this is my immediate concern,
16 I've been working on this, as everyone knows, for five
17 or six, maybe more years, and all I get is, oh, I'm
18 going to do my risk assessment my way, and I'm going
19 to do it my way, and we don't even get to see what
20 these risk assessments, and they get lost.

21 And my very strong position is, I want to
22 see a risk assessment, which is PHMSA's
23 responsibility. And I'm not -- it's just like the
24 NRC, PHMSA needs to impose that requirement on its
25 licensees or its regulated pipeline manufacturer.

1 That's the way the NRC does it, they don't
2 do -- it's not their responsibility to do the risk
3 analysis. And it's not PHMSA's, but PHMSA should
4 assure that we are being protected by ensuring
5 compliance with the regulation. Which is the absolute
6 minimum to assure safety.

7 And then, NRC takes that and the NRC
8 decides, does this present a hazard to the nuclear
9 power plant?

10 MR. SKEEN: Okay. So, appreciate that,
11 Paul. And so, I think what we can do, we recognize
12 the concern. Certainly, we can work with Steve and
13 his folks to verify, or confirm if there was this risk
14 assessment done under the Part 49 regulations. So, we
15 can take that. So, appreciate that statement and I
16 think we can move on from there, then.

17 MR. BLANCH: Yes. That is my number one
18 immediate concern. There's a lot of other issues, but
19 that's my priority right now. And from my
20 communications with PHMSA, PHMSA has dropped the ball
21 and has not done a risk assessment.

22 MR. SKEEN: Okay. I think we understand
23 your concern and we'll look at that to see if we can
24 verify that a risk assessment was done under Part 49.

25 MR. BLANCH: Okay. Okay. Where would we

1 like to go from here?

2 MR. SKEEN: So, I think, in the rest of
3 your letter, it does talk about some other things,
4 some of which I think are covered in the IG findings,
5 but if you wanted to kind of step through those, that
6 was the bulletized issues that you had on another page
7 of your draft letter you had shared with me this
8 morning.

9 MR. BLANCH: Yes. Yes, the -- I made a
10 complaint with the Inspector General's Office. And
11 you know the Inspector General does not have adequate
12 budget, personnel, they get a lot of stuff and they're
13 very selective in what they do and the scope.

14 I asked the Inspector General to look at
15 a lot of different things. They didn't look at
16 everything.

17 Now, one of the things I asked them to do,
18 and I've asked the NRC staff, is Entergy made
19 inaccurate, incomplete, I believe, okay, allege,
20 inaccurate, incomplete, in violation of 10 CFR 50.9,
21 and possibly 50.5. That has never been addressed.
22 Let me see.

23 MR. SKEEN: Okay. So, could you clarify
24 just a little bit on the 50.9, where you think it
25 violated 50.9? Just to help us understand --

1 MR. BLANCH: Sure.

2 MR. SKEEN: -- it, please.

3 MR. BLANCH: Well, in their 50.59
4 evaluation, they clearly stated three-minute closure
5 time. That is an inaccurate statement, inaccurate,
6 incomplete statement. I got better words for it, but
7 I'm going to be nice. It's never been looked at by
8 anyone within the NRC.

9 MR. SKEEN: Okay. I -- just stop right
10 there just a sec, Paul. So, I can tell you, as part
11 of our team, we are looking at that, trying to find
12 out where that one to three minutes came from, as
13 well. So, that will be part of what our report covers
14 when we do that. So, we can certainly look at that
15 one.

16 MR. BLANCH: You and I have talked about
17 that, and we think we might know where it is. But
18 getting back to the root cause of the problem.

19 The NRC is allowing, and accepts and
20 defends, A, inaccurate information provided by a
21 licensee, which has just cost us so much time,
22 trouble, cost the State of New York over a quarter of
23 a million dollars to have their own analysis done.
24 And the NRC won't do anything.

25 And you have laws against providing false

1 information, deliberate misconduct, and inaccurate and
2 incomplete information. But you seem not to be
3 willing to ever enforce those laws. And then, let me
4 see what else.

5 MR. SKEEN: Okay. Just so I understand, so
6 you're saying that the fact that they reported this
7 one to three minutes, that is a violation of the 50.9,
8 that's your concern?

9 MR. BLANCH: Yes, it is.

10 MR. SKEEN: Okay.

11 MR. BLANCH: Unless you --

12 MR. SKEEN: That makes --

13 (Simultaneous speaking.)

14 MR. BLANCH: -- a message, with a
15 violation, intentional, criminal, I don't care what,
16 but anyway.

17 One of my things was fuel in the diesel
18 slurries tank. Dave, you and I, I think, I'm
19 satisfied, if Brian told you that those tanks are
20 empty, that's just fine.

21 MR. SKEEN: And for those that aren't
22 aware, we're talking about the storage, the diesel
23 storage tanks that was for Unit 1, that has been shut
24 down for many years.

25 When they shut down that unit, they

1 abandoned those tanks, they drained them, they cleaned
2 them out, and they valved them off, so that there's
3 nothing in those tanks any more. We did verify that
4 with the Senior Resident Inspector at the site. So,
5 thanks, Paul, I appreciate that.

6 MR. BLANCH: Yes. But my, as we've talked,
7 Dave, my biggest concern is the existing pipelines.
8 Okay. We have two pipelines, one of them's idle right
9 now and the 30-inch is active.

10 They run very close to the switchgear room
11 and the control room. A leak in one of those pipes
12 could cause unignited methane to migrate into the
13 control room, just a few hundred feet away.

14 If that occurs, and I'm talking a gas
15 leak, like we've all seen in our neighborhoods, but a
16 sizeable one, two-inch or greater, and that gas
17 migrates into, especially the control room and the
18 electrical switchgear room, if that gets in there, we
19 are in big trouble.

20 If you take out the switchgear room, then
21 the danger of core damage, spent fuel pool damage, and
22 all your post-Fukushima fixes would not be available.
23 And that's something that absolutely, that is my
24 number one concern, and that has been conveyed many
25 times to the NRC and ignored.

1 So, the risk assessment not only applies
2 to the AIM pipeline, it also applies to existing
3 pipelines, and that's effective in the year 2004. So,
4 I don't think PHMSA has assured that that has been
5 done. And I don't mean to pick on PHMSA, but I've
6 never been able to get a straight answer from them.

7 MR. SKEEN: Okay. Well, thanks for that,
8 Paul, appreciate that. Now, let me understand just a
9 little bit more. So, when you're talking about the
10 existing lines, would the leak be from the underground
11 part? Because there's not -- it's mostly underground
12 it runs on the site, right? It only comes aboveground
13 --

14 MR. BLANCH: Correct.

15 MR. SKEEN: -- just before it gets to the
16 river, is that correct?

17 MR. BLANCH: Yes. It's underground, it
18 comes up out of the ground by the river and that's
19 where the pig station is. And then, from the pig
20 station, it goes across the site, within the owner
21 controlled area, comes within 300 or 400 feet of the
22 control room, switchgear room, and then goes out. And
23 then, it ties into the AIM pipeline.

24 MR. SKEEN: Okay. So, but your concern
25 would be where the aboveground portion of the piping

1 is? Is that what you're concerned about, a gas leak
2 --

3 MR. BLANCH: Well, it's --

4 MR. SKEEN: -- from a --

5 MR. BLANCH: -- primarily the one,
6 aboveground, whatever could cause gas to leak into
7 those areas. Aboveground, below ground, doesn't
8 matter where the source is. But certainly, this is
9 not something that would be acceptable in today's
10 environment, for being built today.

11 MR. SKEEN: Okay. All right. I --

12 MR. BLANCH: And that --

13 MR. SKEEN: -- think I understand your
14 concern. I'm not sure that was one of the findings of
15 the IG report, but like I say, I want to hear all of
16 your concerns one way or the other, to make sure we're
17 addressing what we need to address and if there's
18 things outside of our scope, I want to make sure that
19 those get addressed as well. So, I don't mind at all
20 pursuing this a little bit --

21 MR. BLANCH: Yes.

22 MR. SKEEN: -- with you.

23 MR. BLANCH: Again, when I wrote to the IG,
24 and I think I gave you this letter, all those concerns
25 were outlined in my letter to the IG dated, it was

1 2016, I believe, February somewhere. Those are my
2 concerns, they weren't all addressed by the IG, so
3 that means they're back with the staff.

4 MR. SKEEN: Okay. Okay. I understand, I
5 appreciate that.

6 MR. BLANCH: Okay. Dave, you do have that
7 letter, or I could send it again to you.

8 MR. SKEEN: Well, I think we have that.
9 That was your 2016 letter, right, that you sent in?

10 MR. BLANCH: 2016?

11 MR. SKEEN: Is that -- which one were you
12 referring to?

13 MR. BLANCH: My initial -- yes, 2016, yes.

14 MR. SKEEN: Yes.

15 MR. BLANCH: I think --

16 MR. SKEEN: Yes, we --

17 MR. BLANCH: -- February --

18 MR. SKEEN: -- have that.

19 MR. BLANCH: -- of 2016.

20 MR. SKEEN: Yes, we have that one.

21 MR. BLANCH: Okay. Those are the issues.
22 If the IG didn't address them, then I think the NRC
23 staff needs to close it out. And my final comment
24 here is I have -- this is in my -- you haven't even
25 seen this, Steve, is why I didn't make that a draft.

1 I have extensive experience at Millstone,
2 as you know, Maine Yankee, Indian Point, and other
3 places, and worked with the NRC on safety culture.
4 And I have a limited knowledge of root cause analysis.

5 And if the NRC identified these type of
6 problems at a licensee, they would give them the
7 normal chilling effect letter and they may impose
8 Inspection Procedure 95003 for a total assessment.
9 That's going to be in my final letter to you.

10 And I believe that the NRC has a cultural
11 problem and I think that this definitely needs a root
12 cause assessment, and I know NRC has done these,
13 they've been trained on them. This is a deep rooted
14 cultural problem within the NRC, such as the backward
15 engineering.

16 And I've done it, I will admit, if my boss
17 tells me this is the result that I want, I can go find
18 information supporting that result. That is a
19 cultural problem, I've been a victim of that myself,
20 I've done it.

21 We used to have a document the NRC
22 approved, which is a justification for operations, its
23 name has been changed to something else now. It's
24 basically saying, go find me a solution that I want.
25 Unacceptable.

1 And I believe that the NRC has a severe
2 cultural problem and that needs to be looked at. And
3 you need to look at that Inspection Procedure 95003,
4 see if the NRC fits into that.

5 I know this was not a part of the OIG
6 findings, but from my assessments, somewhat as an
7 expert, even written, Dave, I shared it with you, my
8 paper on safety culture, NRC has a problem.

9 And finally, I support just about
10 everything that was in the letter from the Attorney
11 General from the State of New York dated yesterday,
12 March 19.

13 MR. SKEEN: Okay. I appreciate that. I
14 know we had talked about that, you had mentioned
15 before that you had supported what the Attorney
16 General was sending in, so I appreciate that. And
17 certainly, we can take a look at that and make sure we
18 understand that. Anything else?

19 MR. BLANCH: That's all I have. I will
20 follow up, I'll give you a final copy of that letter,
21 whether you want to keep your draft or not doesn't
22 matter to me.

23 But I will -- before, well, by Monday or
24 Monday night, I will have my final letter out to you.
25 It goes over all these things and what I think the NRC

1 needs to do.

2 And obviously, what Steve said and, not
3 picking on Steve, but I think Steve is going to go
4 back and see if a risk assessment was done in
5 compliance with the regulations. Do I understand that
6 correctly, Steve?

7 MR. SKEEN: Well, we can certainly do that
8 as part of our efforts. I mean --

9 MR. BLANCH: Okay.

10 MR. SKEEN: -- Steve's on the team with us,
11 so we'll make sure that we address that, Paul, because
12 we had been looking at that ourselves, surely there
13 must have been a Part 49 risk assessment done.

14 And we're just trying to uncover that
15 ourselves, to make sure that that was done anyway.
16 So, appreciate your concerns on that, we were kind of
17 heading that direction anyway. So, we'll see what we
18 can find out on that one.

19 MR. BLANCH: Okay. Your job becomes much
20 easier if you can find one that meets the requirement.

21 MR. SKEEN: Yes, I understand, certainly.

22 MR. BLANCH: And -- yes.

23 MR. SKEEN: Go ahead.

24 MR. BLANCH: And I just want to say this,
25 Sandia is involved. I have no problem whatsoever with

1 Sandia. If Sandia is directed to go out and do a risk
2 assessment in accordance with the requirements, I have
3 no problem with that, as long as they're in compliance
4 with the requirements.

5 MR. SKEEN: Okay. Thank you for that, I
6 appreciate that too. We did want to talk about some
7 of the NRC process issues.

8 MR. BLANCH: Sure.

9 MR. SKEEN: That's one I think that we can
10 -- we need to have a good understanding of that as we
11 go forward, if the agency is going to try to do
12 something about some of our processes. So, I do want
13 to touch on that with you as well.

14 MR. BLANCH: Yes. Well -- yes. There's
15 one other technical thing I need to address, do you
16 mind, Dave?

17 MR. SKEEN: No, please, go ahead.

18 MR. BLANCH: Okay. The -- I had sent you
19 our calculations done by Dave Lochbaum and a few other
20 people. And they're the calculations that were done
21 based on the equation provided in Regulatory Guide
22 1.91.

23 And I asked four different people and we
24 all came up with similar results, that go out greater,
25 the blast pressure greater than one pound going out

1 beyond 4,000 feet, or whatever the number, you got the
2 information.

3 But the ASME document that is incorporated
4 by reference also has an equation for calculating the
5 impact radius. Okay. It's a different equation,
6 comes up with a completely different result.

7 The purpose of the PIR equation in ASME
8 B31.8S is to determine the high consequence area. You
9 come up with a number, it could be 660 feet, it could
10 be a thousand feet.

11 Its only purpose is to calculate the area
12 that is covered by high consequence area requirements.
13 It's not meant to say that if you're at more than
14 that, you're not going to be in danger, which is what
15 the NRC equation is.

16 The intent of both equations, I thought
17 was the same thing, but it's not. So, just be aware
18 of that. I have no problem with the NRC's equation.

19 MR. SKEEN: Well, I appreciate that, Paul.
20 That's one thing we were looking at, was the Reg Guide
21 1.91, to see if it was clear or if there's things that
22 maybe it needs to be clarified in some way in how to
23 apply that. So, appreciate that information that you
24 provided to us.

25 MR. BLANCH: Okay. Sorry to interrupt you

1 there.

2 MR. SKEEN: Oh, no, that's fine. That's
3 okay. So, those are the kinds of things we want to
4 hear, right? Because to me, that is process, if
5 you're telling me that some of our procedures may not
6 be clear or appropriate. So, that's what we're
7 looking at as well, as part of our effort.

8 MR. BLANCH: Yes, I'm saying Reg Guide 1.91
9 equation is very clear. You just have to plug in the
10 numbers and go. I haven't had a problem with it.

11 MR. SKEEN: Okay. So, you think 1.91 is
12 okay the way it is?

13 MR. BLANCH: I think so, unless you guys
14 see something wrong with it.

15 MR. SKEEN: Well, we'll look into that and
16 see. That was one that we wanted to make sure we
17 understood. So, I appreciate your input on that,
18 that's good.

19 What if we turn to the 2.206 process now?
20 I know that you've had some concerns with that over
21 the years, so if you could kind of enlighten us a
22 little bit more on some of the concerns with that
23 process?

24 MR. BLANCH: Yes. That process, and I've
25 probably filed five, over my lifetime. And the first

1 thing we get is a, we've rejected because, or we don't
2 see any immediate problem. I've got one in the works
3 out at Southern Cal Edison right now.

4 So, we get an immediate response from the
5 NRC, we don't see any problem. And this gets back to
6 the culture, okay? They've already made a
7 determination, there's no problem, and then, the NRC
8 sends its Petition Review Board out, okay, come and
9 support my conclusion I've already done here.

10 It's, again, getting back to the IG's
11 statement about backward engineering. It's a real
12 problem and we've faced it time and time again. I had
13 a very well thought out petition, well, not only this
14 one on the pipeline, but we had one that I filed with
15 Arnie Gunderson on Vermont Yankee and tritium leaks.

16 And it's just that if we look historically
17 at 2.206 petitions, the number of them in the last 20-
18 30 years has been 400, either -- many of them may be
19 not valid, but many of them are valid, but they've all
20 been rejected. There might have been two that have
21 been partially accepted.

22 So, one's chances of getting a 2.206
23 petition granted, even though it comes from people
24 with credibility, and I say credibility, Dave Lochbaum
25 has credibility, I have credibility, Arnie Gunderson

1 has some credibility, everything's always rejected.
2 Something's wrong with it.

3 If a licensee comes in and makes a request
4 to change something, to reduce safety margin, it's
5 always, it's never rejected. We just get the feeling
6 that the NRC is not protecting the public by not
7 listening to our 2.206 petitions.

8 I mean, how many years did we spend on
9 this one that I put in? And no one has pointed out
10 why it was wrong. Something is wrong within the
11 agency that essentially they automatically find a way
12 to reject petitions from the public on safety issues.

13 And sometimes, these members of the
14 public, like myself, have as much, if not more,
15 expertise than the NRC staff has. So, anyway, that's
16 the general complaint I have. I'm not sure how we
17 address that.

18 MR. SKEEN: Okay. No, I appreciate that,
19 Paul, it's good feedback. And that's something we're
20 looking at too, is how does the NRC handle the 2.206
21 petitions that we get in and are we being true to our
22 processes? And so, I do appreciate your input on
23 that.

24 MR. BLANCH: Yes, and that goes back a long
25 way, to 1993, when I was working with Senator

1 Lieberman and Dan Berkovitz, who was his chief of
2 staff on the committee, and we were working on the
3 2.206 process and should that have the ability to
4 appeal the NRR director's decision?

5 And because of the politics at the time,
6 there's no legal appeal to a director's decision on
7 that. So, when a director says, no, this is not a
8 problem, we have no way to appeal.

9 I know that's a Congressional issue, it's
10 part of the Atomic Energy Act, but it's obviously
11 something that irks me. But on a positive side,
12 you're one of the few agencies that does have a
13 petition process. Okay.

14 I think those are big issues. I don't
15 think we need to get into specific, but the culture is
16 bad, and I understand that, we've seen cultural
17 problems in a lot of regulated industries. We've seen
18 the Boeing recently. We've seen airline industry.
19 You look at NTSB studies and stuff, you see cultural
20 problems identified.

21 So, those are my concerns, you know where
22 my priorities are and you know what I think has to be
23 addressed.

24 MR. SKEEN: Yes, no, I appreciate that.
25 But another thing I wanted to raise with you as well,

1 Paul, is what about the interactions among the
2 different agencies, the government, and dealing with
3 the different agencies? As far as communication or
4 understanding the roles and responsibilities of the
5 various agencies, did you see any issues with that in
6 your --

7 MR. BLANCH: No, I don't. I don't know
8 what it is between PHMSA and FERC and EPA, but I can
9 say I think the interactions on a subject like this,
10 of putting a 42-inch gas line next to a nuclear power
11 plant, from an outsider's observation, there was no
12 communication with PHMSA, with the licensee.

13 Now, there's a big problem. It's probably
14 very rare that two agencies are facing such an
15 overlapping problem. But on something like this, my
16 God, there has to be some good communication and open
17 communication. What is the risk of this line? What
18 harm's it going to do?

19 And NRC, I'm not saying it's all NRC, but
20 NRC should have been communicating with PHMSA all
21 along on this thing, to assure that the public is
22 adequately protected, not only from gas lines, but
23 from its impact on nuclear plants, or potential impact
24 on nuclear plants. You could have gotten ahead of the
25 curve with proper communication back in 2014, I think.

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1 And the fact that you just blindly
2 accepted Entergy's 50.59 analysis, without question,
3 is inexcusable. And that question could have gone
4 from the NRC to PHMSA, hey, is this three minutes
5 really possible?

6 You, Dave, as an engineer, and me, as an
7 engineer, and every other engineer, including Rick
8 Kuprewicz, and I'm not sure that Steve will even
9 disagree, that the time to identify a leak at a
10 minimum is 30 minutes, from 920 documents I've looked
11 at from PHMSA.

12 And someone not being able to recognize
13 that false statement by Entergy is unforgivable. And
14 they --

15 MR. SKEEN: Okay.

16 MR. BLANCH: -- ought to pay a price.

17 MR. SKEEN: No, I understand, I understand
18 your concern there. But, I guess, as far as the
19 communications, was it -- apparently, from the
20 outside, it looks like there were no communications
21 among the agencies at all.

22 And so, that's what I'm wondering, is it
23 a public communication issue, that we're not doing
24 enough to communicate with the public? Or is it an
25 internal interagency issue of communications between

1 agencies?

2 MR. BLANCH: Well, I don't know the
3 interactions between agencies, I have -- that
4 information is never made public or I never see it.
5 I've never seen any formal communication between the
6 NRC and PHMSA or FERC or anything like that. So, yes,
7 our perception, there is none. And believe me, we've
8 tried to get it.

9 MR. SKEEN: Okay. That's helpful
10 information too, so I appreciate that piece as well.

11 MR. BLANCH: Okay. Anyone else?

12 MR. SKEEN: Well, I want to make sure that
13 the team, because I'm doing all the talking here, but
14 a lot of the team has a lot of the technical
15 capabilities, so I want to make sure I leave a chance
16 for other folks to, if they have clarifying questions
17 or maybe something that they've been working on that
18 they want to make sure they understand from you.

19 So, if you're okay, I'll open it up and
20 let Theresa go first. And then, ask if other team
21 members might have questions or explanations for you.
22 Let's do that. Theresa?

23 MS. CLARK: Hi, Paul, this is Theresa
24 Clark. Thanks again for taking the time to talk to
25 us, I think this has been really helpful to hear in-

1 person, or virtually in-person at least --

2 MR. BLANCH: Right.

3 MS. CLARK: -- what some of your concerns
4 are. I have a couple of questions, a couple of
5 process ones, I think, and then, technical ones.
6 We're quite interested in both angles of this, it's
7 what the Chairman asked us to look at.

8 One thing that you just mentioned about
9 proper communications that we could have had back in
10 2014, one of the things I've been struggling with in
11 putting together the documents that we might include
12 in our report is that some of the analyses that were
13 done had security related information in them, when we
14 were talking about specific distances from here to
15 there, for example.

16 And it seems like that may have
17 complicated some of our communications on these
18 issues. Do you have a perspective on that?

19 MR. BLANCH: Yes, I do, because I have
20 received from FERC, over Algonquin's objections, I
21 have received CEII clearance from FERC. I've conveyed
22 that to the NRC. So, that should not have been a
23 problem with those people. I know Rick Kuprewicz also
24 has CEII clearance.

25 So, I agree there may be some issues,

1 security issues, terrorism issues, and so on, that may
2 contain CEII, but not most of it. And as I say, I
3 have that clearance.

4 MS. CLARK: Thanks, Paul, that's helpful.
5 What about how we communicate these issues to the
6 broader public, who don't have those clearances? Are
7 there ways that we could communicate better on these
8 topics without getting into details that we shouldn't?

9 MR. BLANCH: Sure, I think that you could
10 hold public meetings and say, hey, we've addressed
11 terrorism, we've addressed EMP, whatever else might be
12 considered CEII information.

13 And if you got before the public and said,
14 hey, we've looked at these, it's security related or
15 CEII related, but I provide you my assurance that we
16 have looked at it and we're satisfied with it, that's
17 never been done.

18 MS. CLARK: Okay. That's fair, thank you.
19 So, you mentioned a couple minutes ago about documents
20 that you had looked at from PHMSA, I think you said a
21 number of 920, I didn't know if that was a number of
22 documents or a specific document, on valve closure
23 times. Are there specific references that you want to
24 offer to us?

25 MR. BLANCH: Sure, I've sent Dave a

1 spreadsheet. Correct, Dave?

2 MR. SKEEN: Yes, we have the spreadsheet
3 that you sent on the pipe rupture data.

4 MR. BLANCH: Yes. That is, I'm not sure
5 how far it goes back, but I think there were 921
6 events identified by PHMSA and it provides location,
7 latitude, longitude, size of the leak, did it
8 explode?, did it not explode?, time identified, time
9 event occurred. You've got it all. And that is not
10 Paul Blanch's data, that is on PHMSA's website.

11 MS. CLARK: Okay, Paul, I was confused
12 about that. Yes, we definitely have that spreadsheet.
13 I couldn't remember whether that spreadsheet included
14 data that would let us calculate how long it took to
15 detect and isolate these issues.

16 MR. BLANCH: Yes, it does.

17 MS. CLARK: Okay, thanks. We'll take
18 another look at that. And then, I guess --

19 MR. BLANCH: There's so --

20 MS. CLARK: -- my last --

21 MR. BLANCH: -- many columns --

22 MS. CLARK: Go ahead, please.

23 MR. BLANCH: -- of data, so many columns of
24 data, you're going to have to parse it and sort it and
25 everything, which I've done, and that's how I found

1 out there's --

2 MS. CLARK: Okay.

3 MR. BLANCH: -- anywhere from 30 minutes to
4 30 hours --

5 MS. CLARK: Okay.

6 MR. BLANCH: -- for a response time.

7 MS. CLARK: Understand. Thank you. And I
8 guess, I want to give other folks some air time here,
9 but you mentioned a few minutes ago about the Reg
10 Guide 1.91 equations and the calculations that you and
11 some of the others had done using those.

12 And I think the number that you mentioned,
13 knowing that it wasn't necessarily the exact number,
14 was something like a 4,000-foot radius.

15 I wanted to clarify, is that -- your point
16 was that this was the number that you got using our
17 equation, so it raised some questions in your mind, or
18 were you concerned that that was, perhaps I'm not
19 saying this the right way, but the radius of concern
20 for the plant?

21 MR. BLANCH: I didn't --

22 MS. CLARK: Am I making sense?

23 MR. BLANCH: -- look into the derivation of
24 the equation in Reg Guide 1.91. I'm ex-Navy reactor
25 operator and degreed electrical engineer, understand

1 all that stuff.

2 But when I did the calculations, given the
3 gas flow through that line, assuming that comes out,
4 I did a plot, as Dave Lochbaum did and Joe Carson,
5 Larry Criscione, we all came up with the same numbers
6 and they all go out thousands of thousands of feet.
7 And that's just for the pressure pulse.

8 We did not use ALOHA, we used your
9 numbers, and we all came up with a similar thing. Is
10 that right? I don't know, but that's the only thing
11 we could go by, we're not gas experts.

12 MS. CLARK: Okay. I think I understand, I
13 just wanted to clarify that. So, do you have a feel
14 for whether you think there would be impacts at that
15 distance? Or is the point that you're making more
16 specific to how the equation works?

17 MR. BLANCH: Well, the equation works such
18 that it predicts the impact going out, based on the
19 gas flow and time.

20 And that's what the results of the
21 equation say, that the impact, depending on the amount
22 of time it takes to isolate the leak, goes out this
23 far. And I would assume it includes pressure pulses,
24 heat flux, vapor clouds, and so on and so forth. I
25 don't know the derivation of your equation in 1.91.

1 MS. CLARK: Okay. Thanks, Paul. And
2 that's why I have smart people helping us out, because
3 I don't think I do either, at this point. But I'm
4 learning a lot.

5 MR. BLANCH: I'm not the only dumb one
6 here, huh?

7 MS. CLARK: Hey, I didn't say I was dumb.
8 (Laughter.)

9 MR. BLANCH: I'm saying I am.

10 MS. CLARK: Just kidding. Okay. I think
11 that's everything I have this second. Dave, you want
12 to call the next person?

13 MR. SKEEN: Yes. Suzanne, did you have
14 anything that you wanted to raise?

15 MS. DENNIS: Yes. Hi, Paul, this is
16 Suzanne Dennis. I was looking over the calculations
17 that you had sent to Dave about what other people had
18 seen using those Reg Guide 1.91 calculations.

19 MR. BLANCH: Yes.

20 MS. DENNIS: The minutes that were used
21 differed. And so, I was just wondering how the
22 timings were chosen for those expert evaluations, or
23 if you just had asked, hey, take an independent look
24 at this and let me know, and each expert kind of
25 picked?

1 MR. BLANCH: Well, what I did, I told Dave
2 and Larry and Joe to, hey, here's the equation, here's
3 the flow rate, what's the impact radius, based on the
4 1.91 equation? And we all came up with numbers that
5 are plus or minus 20-30 percent. So, they're ballpark
6 numbers.

7 MS. DENNIS: Okay. All right. Yes, that's
8 very helpful, thank you. And then, as our resident
9 risk analysis expert, I just wanted to, one, ask for
10 some clarification and maybe provide some
11 clarification too.

12 So, at the NRC, when we talk about risk
13 assessment, we're usually talking about probabilistic
14 risk assessment, so not only the consequence, but also
15 the frequency of the event occurring.

16 And I think, and Steve can correct me if
17 I'm wrong here, but the PHMSA risk assessment that is
18 in the regulations isn't quite that. It's more making
19 sure that the pipeline operators have taken steps to
20 ensure that there is limited risk.

21 So, essentially, trying to lower that
22 probability portion of the equation. And I think at
23 NRC, we're kind of looking at risk a little
24 differently. So, I didn't know if you had any
25 thoughts on that or Steve had any thoughts on that.

1 MR. BLANCH: I briefly looked at the
2 regulation 917, 935, and I briefly looked at the ASME
3 B31.8 document.

4 And what I got out of the ASME document
5 is, here are 22 scenarios that you must evaluate, from
6 tornado to flooding to ice age to global warming to
7 vandalism, didn't use the word terrorism. And those
8 are probabilistic, more than consequences, I think.

9 I don't know how -- I mean, that damn
10 document is 800-page long, but that's the document
11 that was approved by the industry.

12 MS. DENNIS: Got it, understood.

13 MR. SKEEN: Any other questions, Suzanne?

14 MS. DENNIS: No, that's all I have.
15 Thanks, Dave.

16 MR. SKEEN: Rene'e, did you have any
17 questions?

18 MS. LI: Yes. Paul, I would like to get
19 some clarification on the calculation that we got, or
20 I got, today, if they are thorough calculation.

21 And I noted that, in one of the table,
22 that you calculate, it's a table that lists for the
23 Indian Point blast radius calculation. And then, the
24 first column is time in minutes. And then, there's a
25 column that describe the mass of vapor. So --

1 MR. BLANCH: Correct.

2 MS. LI: -- like the first minute is
3 376,000 kilogram. And then, for the two minutes,
4 because the increase by 200,000 kilogram, so it become
5 576,000. And then, the next minute, it increase by
6 100,000, resulting in 676,000. And there, after that,
7 every minute, you would increase by 100,000.

8 So, that's this table and it's consistent
9 with the number that in the calculation by Dave that
10 use this and then, used the Reg Guide 1.91 equation to
11 calculate the radius.

12 But I noticed that in Joe Carson's
13 calculation, I think that use a different approach,
14 assuming average flow rate of 1,877 kilograms per
15 second and last for six minutes. So, that's 360
16 seconds. And times this two number, it come up with
17 approximately same as the three minutes in the other
18 two calculation, it's about 676,000.

19 And therefore, all the calculation using
20 the Reg Guide 1.91 equation result in a pretty
21 consistent radius, blast radius.

22 And I'm just wondering, the two different
23 assumption, one is the average flow rate times the six
24 minutes and the other one just has for one minute,
25 what's the release of mass, and the three minutes,

1 after three minutes, it come up with a pretty same
2 mass of vapor. Do you have some thought about what's
3 behind these two consideration?

4 MR. BLANCH: Yes, I do. It was from a
5 document, an email from Dave Bellio, who's NRC staff,
6 and it should have been redacted. It was redacted one
7 FOIA request, but unredacted in another.

8 And Dave Bellio actually gave the flow
9 rate in dekatherms for minute for various times. So,
10 I used those numbers from Dave Bellio. If you don't
11 have them, I could probably find them with a little
12 bit of effort.

13 But those are the numbers that I used when
14 I calculated it. I can't say for sure that Dave
15 Lochbaum and Larry and Joe used the same numbers, but
16 I would suspect they did. So, those numbers were
17 given to me by the staff.

18 MS. LI: I see. Thank you. Yes, I just
19 wondering, because one is accounting for three
20 minutes, the other is six minutes, but somehow it come
21 out with the same mass of vapor.

22 MR. BLANCH: Yes, I didn't go over the
23 details of the other engineers' calculations. So,
24 sorry, but I can't give you a definitive answer, other
25 than we used David Bellio's numbers.

1 MS. LI: Okay, thank you.

2 MR. BLANCH: You're welcome.

3 MR. SKEEN: Yes, thanks for that, Paul. I
4 know it was fairly technical for other folks to hear,
5 but I know Rene'e was looking at the calculations that
6 you had provided. So, we thought this was a good
7 opportunity to ask a question of that, too. So, I
8 appreciate you being able to answer that for us.

9 Anyone else? Steve, did you have any
10 questions you wanted to raise?

11 MR. NANNY: I just have one clarification
12 I'd like to know. I kept hearing Regulation 1.92 and
13 1.91, and I just wanted to make sure, when I was
14 hearing the 1.92, you weren't by mistake meaning the
15 DOT Part 192?

16 MR. BLANCH: Oh, no, let me clarify. I'm
17 looking at PHMSA Regulation 49.192. Now, under there
18 are subregulations --

19 MR. NANNY: There isn't a DOT Regulation
20 0.192, there is --

21 MR. BLANCH: No.

22 MR. NANNY: -- DOT Regulation 192, that's
23 what my clarification was.

24 MR. BLANCH: No, the --

25 MR. NANNY: Were you --

1 MR. BLANCH: The regulation is 49 CFR
2 192.917 and 192.935.

3 MR. NANNEY: Okay. And you also mentioned
4 a calculation you were doing for blast radius of some
5 equation. What equation was that that you were using?

6 MR. BLANCH: I was using the NRC's equation
7 for external threats, including gas lines. NRC will
8 be able to give you them, they're in Regulatory Guide
9 1.91. But you need input to that too.

10 MR. NANNEY: Okay. Thank you.

11 MR. SKEEN: Yes, and we can discuss that,
12 Steve. That's in our own Reg Guide, so we can
13 certainly discuss that with you.

14 MR. NANNEY: Okay. Thank you.

15 MR. SKEEN: So, no other questions?

16 MR. BLANCH: For an old man, I can remember
17 all those numbers. Been around them long enough.

18 MR. SKEEN: You did very well.

19 MR. BLANCH: Thank you.

20 MR. SKEEN: So, again, Paul, we appreciate
21 you taking the time to talk to us. As you know, we're
22 on this time line to try to get this report to the
23 Commission.

24 I thought it was very important to talk
25 with you today, and with Rick Kuprewicz as well, to

1 make sure we understand the concerns coming in from
2 you.

3 And we'll certainly take this forward in
4 our considerations as we get ready to write our report
5 and get something to the Commission.

6 MR. BLANCH: I don't envy you guys.

7 MR. SKEEN: I appreciate that, but we've
8 got a good team here. So, between our internal and
9 external folks, we've got some really good experts
10 that we're working on this.

11 MR. BLANCH: Especially the letter from the
12 State of New York, it went to the world.

13 MR. SKEEN: Yes.

14 MR. BLANCH: So, you are --

15 MR. SKEEN: I think, we're aware of that,
16 I think.

17 MR. BLANCH: Thank you, Dave, for your
18 consideration, obviously.

19 MR. SKEEN: Yes, I understand.

20 MR. BLANCH: Okay. I have --

21 MR. SKEEN: Okay. We --

22 MR. BLANCH: -- spoken my piece.

23 MR. SKEEN: Well, we certainly appreciate
24 your time and this gives us some more information to
25 consider as we go forward.

1 And if you have any other issues, I know
2 you're not shy about letting me know if you have other
3 issues coming along or concerns. So, certainly feel
4 free to pass anything along that you do have.

5 We do have a few weeks before we have to
6 get the report to the Commission, so if there's
7 anything we can factor in, we'll certainly try to do
8 that.

9 MR. BLANCH: I've never been shy, never
10 been accused of it.

11 MR. SKEEN: Well, thank you --

12 MR. BLANCH: I will do it. I appreciate
13 everyone's time.

14 MR. SKEEN: All right. We appreciate you
15 talking with us. So, you have a good afternoon and
16 I'm sure we'll be talking with you.

17 MR. BLANCH: You too, ladies and gentlemen,
18 thank you.

19 (Whereupon, the above-entitled matter went
20 off the record at 2:12 p.m.)

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