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October 25, 2011

To: VSNAP members
Cc: Bernard Buteau, Vermont Yankee State Liaison Engineer

From: Uldis Vanags, DPS Nuclear Engineer

Subject: VY Turbine Oil Vapor Extractor Vent

At the last VSNAP meeting (October 19, 2011), during the public comment period, Mr. Mike Mulligan provided information on a petition (Attachment 1) he submitted to the NRC on August 26, 2011 where he expressed a concern that the Turbine Oil Vapor Extractor Vent was an unmonitored radiological release path and not accounted for in the Vermont Yankee (VY) effluent release report or the environmental radiation report. Mr. Mulligan filed this concern to the NRC per 10 CFR 2.206 and the NRC has not completed its determination to date.

Mr. Mulligan inquired to me (on October 17, 2011) whether the visible vapor from the Turbine Oil Vapor Extractor Vent had any radioactivity associated with it. I posed this question to Vermont Yankee and learned that Vermont Yankee reviewed Mr. Mulligan's petition to the NRC and the question of whether the Turbine Oil Vapor Extractor Vent was an unmonitored radiological release path. Vermont Yankee found that there wasn't adequate information to answer this question, so VY generated a Condition Report (CR-VTY-2011-03628) on September 12, 2011 which creates a process for investigation and corrective actions. The investigation into this matter so far has determined that based on a 2006 Engineering Review of plant systems, it is likely that the Turbine Oil Vapor Extractor Vent contains tritium, a radionuclide. However, evaluation of the vapor from the vent is need prior to determining whether this is a release pathway that would require reporting. Thus the actions to be taken are:

- 1) Develop and proceduralize a method for testing the Turbine Oil Vapor Extractor Vent for radionuclide content. Due by November 28, 2011.
- 2) Perform a sampling of the Vent for radionuclides, including tritium. Due by December 10, 2011.
- 3) Using the results of the vent radionuclide analysis, conduct a dose analysis to determine the radiological significance. Due on February 27, 2012.
- 4) If the dose analysis requires reportability update the Vermont Yankee Off-Site Dose Calculation Manual (ODCM). If an ODCM revision is not necessary document the justification. Due on March 13, 2012.



August 26, 2011

R. William Borchardt
Executive Director for Operations
US Nuclear Regulatory Commission
Washington, DC 20555-0001

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Dear Mr. Borchardt,

This below link a recent picture of a steam or vapor plume coming from the Vermont Yankee turbine building roof.

'VY Turbine Lube Oil Vapor Extractor': <http://steamshovel2002.blogspot.com/>

Palisades 2.206 Feb 18, 2011: "The length of time it takes for the NRC to see the big picture, they parse the information out in way to purposely dilute the accountability...is a grand agency falsification to their bosses, us."

Me anticipating Entergy's Aug 24, 2011 confirmatory order on QA/QC and employee concern.

Palisades 2.206 Feb 18, 2011: This is what I am talking about, the little games between NRC and licensee. How the NRC intentionally rolls out the QA/QC violations, it is intended to let the licensee claim credit for what the agency found or dug up.

And here we are today, the NRC and Entergy are claiming great credit for the response and order. They sound like heroes. The great majority of the agency statement should not be about what Entergy or whar the NRC did. The agency should be spending all their print on how grateful the nation is to the whistleblower employee who open his mouth and complained to the NRC. Why didn't this guy get a NRC ceremony and letter of commendation? Why doesn't the agency acknowledge how heroic this employee was coming to the NRC...how grateful a employee like this is to the NRC. The agency spends a lot of sentences talking about the so called good deeds of Entergy after the complaint, but treats the whistleblower employee as technical detail of very little importance. What is the agency saying to future potential whistleblower employee. Your company that attempted to silence you will be repeatedly patted on the back in a 'confirmatory order", while the deeds of the whistleblower employee will be insultingly minimized. You whistleblowers will never get praised for your heroic deeds by the agency cause your are nothing but a pain in the ass.

I thought it would be educational going over my February 18, 2011 petition with Palisades. I was correct that a whistleblower was involved with the QA/QC falsification. I was correct the nation as a whole would never learn about the magnitude of the problem until Entergy took credit for correcting it and the majority of the corrective action have been completed.

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Ain't I going on some kind of rant with this in February 2011. All the nuclear meltdowns and explosions of Fukushima were just but a month away.

February 18, 2011

Subject 2.206: Request a emergency shutdown of Palisades because the Reactor Oversight Program is ineffective and Entergy has a documented history of a culture of falsification and thumbing their noses at reoccurring violations. It should be noted in this inspection period most of the fleet of Entergy's plants are on fire and burning in the Gulf of Mexico with numerous NRC inspection findings including Grand Gulf, River Bend, Arkansas One and Cooper.

Jan 18, 2011: my 2.206 Emergency shutdown of Vermont Yankee

"The safety culture of the plant is impaired because of information inaccuracies and wide spread acceptance of falsifications.

I request Vermont Yankee to be immediately be shut down and that Entergy be prohibited from owning nuclear power plants... because Entergy doesn't have the integrity to tell the truth about safety and nuclear power plant issues. Money and profits comes before truth telling and full disclosures."

Dear Mr. Borchardt,

In the 1942 movie Casablanca:

Rick Blaine: How can you close me up? On what grounds?

Captain Louis Renault: I'm shocked, shocked to find that gambling is going on in here.

We generally see Entergy sabotaging and crippling their internal oversight organizations on purpose as a business model. This seemingly makes the front line troops more efficient and cost effective in the short term by not having to follow the codes and procedures.

God help us all, can you see the problem with the repetitive nature of Entergy having the instincts to not do the proper inspections...to do it over and over again like a madman. They are laughing at us and the NRC because these employees and managers know we can't control them. The NRC has no ability to control Palisades...that is my god damned political statement to the NRC. They are constrained by the campaign contribution leaking out of the NRC like the intimidation tritium.

It is a national disgrace with what we think about government oversight. The NRC is essentially a private regulator and the owners of the regulatory authority are the nuclear utilities and Republicans themselves. Most of engineering codes are paid directly by the nuclear utilities to the private code authorities like ASME and ANS. This thing has become a voluntary compliance and code thing...we have absolutely privatized nuclear power plant engineering safety compliance into a corporatism code authority. They have no teeth and no requirements to give the public much information. Collectively the oversight and engineering code standards for nuclear

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plants are in the hands of private authorities. The nuclear industry pays for them or pays to not have the right codes...it is not that different than the absence of government oversight in the Deep Water Horizon out the Gulf of Mexico. The set up of the NRC as a independent federal regulator places regulation into the hands of a rabid mad dog "I hate everything the government" Republican cronies in the House and Senate. The so called independent authority means mostly at the whims of the House and Senate nuclear industry cronies. This makes the NRC the most politicize regulator in the nation. The NRC cringes over the power of the House and Senate industry political cronies....mostly the House. The nuclear industry basically has such a small population footprint, they are such a small proportion of our population....effectively this makes them immune to the will of the ethics and morality of the public. We have housed the nuclear industry increasingly behind a impermeable security and information barrier in support of the republican cronies and the indifferent small d democrats. Increasingly the regulations and laws cage the NRC and plant inspectors...they set free Entergy to do anything thy want. Remember way back, when I talked about these events spinning around in the ether of history past, current and future? This is a gagging systemic falsification on a unimaginable scale and across many plants. There is so many safety inspections missing and their immune system was dead in the water. They still haven't done the inspection at the plant level...what will they find there? The NRC frames it as a failure to implement experience and qualification requirements. But it is a sickening falsification of QA/QC and manger safety employment credentials. I wonder if the NRC has entered it into the legal system? The trick of the NRC is it cycles through the system for years. This gives them an excuse hide the magnitude of the problem until all the correction are in. So you will partially understand what happened, like maybe the security manager falsification...but it will be years before we know what really happened. The completion of the corrective action could be decades off. I bet you this is a whistleblower issue. I asked before, has Entergy sabotage their safety oversight in ordered to make profits? This poisoned the minds and spirits of so many good employee. These so call QA/QC managers. Falsification of "Quality Assurance" manager safety job qualification....They falsified the professional credential of how many managers, remember if a QA/QC department were engineered to be incompetent, that means the safety work can be done faster and cheaper without the proper quality of the work. It is just a business objective with Entergy to try and squeak as much work as the can under the proper codes, rules and professional employment qualification as fast as they can. FASTER, CHEAPER, BETTER: survival only with high capacity. It is just a business ideological tenet. It is lying and falsification to make profits as a acceptable business strategy or model for both Entergy and the NRC! It is lying and falsification in order to gain societal status and rewards...it is not about making our lives better. This is nothing about the NRC fulfillment of their procedures or rules. Procedures and rules have no soul and spirit, just like a machine. They got to be doing this for a higher reason. Increasingly the NRC thinks their rules and regulations are the primary objective of what they do. It gets down to malicious compliance with congressional intent. It is knowing compliance with legislative intent is going to drive our nation over a cliff. The intent of regulations is for greater safety and that the utilities are in service to our nation. It gets down to NRC malignant and

narcissistic compliance to legislative intent. It is what they have to do to go home and enjoy their children and families. It is turning providing for your families on its head...it is altruism abuse and disorder of the highest order. It has become such a horrendously narrow pathway...it is no doubt our politics are driving this narrow mind set.

....If we magically knew everything though a push of a button of all the sins of Entergy, had a perfect image...then there would be an incentive or punishment to fit the condition driven from all we know. The objective of it all is to make a better world for ourselves. We would have a god's view of the QA/QC and safety system problems...the magnitude of the pain of punishment to Entergy would drive Entergy to reform themselves more deeply. The length of time it takes for the NRC to see the big picture, they parse the information out in way to purposely dilute the accountability...is a grand agency falsification to their bosses, us. It cheats Entergy's stockholders and ratepayers from a full recovery, as does its employees. Doesn't that bother you people, we don't have at our fingertips the ability to know all the safety equipment meets the codes and Entergy is a fully healthy nuclear utility. The things that are in the temporal dimension...in time...we don't get a image that helps us see the real sequence and magnitude of all the defects. It doesn't help us to make Entergy better. Everything is politically diluted thinking and incomplete facts...but we are following the whims and wishes of congress through our regulations and dictates, and they think that is in the nation's best interest.

This the biggest philosophical question out of all of this is; does following the rules, policies, codes and procedures get us to the outcome we want. Will following the rules bring us all back home safety and soundly? Is following the rules the ends, or is these some higher calling or order we should direct our heart and heads towards? This is what I am talking about, the little games between NRC and licensee. How the NRC intentionally rolls out the QA/QC violations, it is intended to let the licensee claim credit for what the agency found or dug up. Does this in any way make sense for a initial inspection finding that Entergy can claim credit for indentifying the violation. It is utter insanity coming from the regulator. I know, you are just following the rules.

As we know, the inspection on problems with QA/QC is incomplete...we have no idea of the magnitude of the problems as stated by the NRC at the plant level. I request Palisades be shutdown and stay shutdown until all the problems with QA/QC are thoroughly investigated and fixed. I request all employees who gave false and incomplete information to the agency be prosecuted to the fullest extent of the law. I request any employee who knew about this or should have known about it...be not allowed to work in nuclear related activities.

One must remember in a organization that violates the rules and lies so often you have set up a honor culture and cult of enforcers. I cover your back, you cover my back, no matter how unethical we become. You got to have a enforcer system so employees don't disclose secret violation of federal rules to outsiders. You separate your employees into two groups. The groups may be expressed as 'them' and 'us', or may be the 'good guys' against the 'bad guys'. The top group enforces the behavior of the bottom group. You get promoted on who you blow, and not what you know. Generally management exaggerate the faults and good deeds of the people they choose for no other reason than they will systemically violate codes of conduct. If you

are a 'good guy' your faults are down played. If are one of 'them' the good catches are never documented, never acknowledged, absent in the employee evaluation, and forget about getting a promotion. A dead ender plant ends up in a full scale war between the groups. Then employees' spend all their time trying to sabotage each other or trying to slit the throats of each other's careers. It is really a amazing thing to be in a organization that is at war with themselves."

Back to Vermont Yankee and the end of August 2011...

<http://www.topix.com/forum/city/brattleboro-vt/T2S3DO4B9VS45S6P2>

'VY Turbine Lube Oil Vapor Extractor': <http://steamshovel2002.blogspot.com/>

I request a emergency shutdown of Vermont Yankee due to them having a unmonitored radiological release path and their environmental reports for decades have been inaccurate and falsified. Not restarted until the extractor discharge to diverted to the stack.

- 1) Request a immediate report within week of getting this. The basic function of the vapor extractor and immediate radiological reading of the discharge and listing of all the nuclides.
- 2) What is in the vapor? Does reactor steam and water get released out the vent on top of the turbine building roof.
- 3) Is it all lube oil fumes and is that disclosed in any government reports. How much lube oil gets discharged to the environment?
- 4) Where does the rain water go to that collects on the roof...is it monitored? Does it go to the river? It is radioactive?
- 5) What is the nature of the contamination on top of the roof...lube oil and redaction?
- 6) Does radiation from the vent enter Hinsdale NH and is it disclosed?
- 7) How much turbine building air get sucked into the lube oil return and is there turbine steam or condensed water that gets sucked through the system. What is the levels
- 8) I'd like a estimate of radiological readings of the discharge, in any and all of Vermont Yankee's past fuel failures...
- 9) What is the radiological content of the turbine lube oil system...
- 10) The roof drains to the plant sewers to the river outfall north of the intake...is there lube oil and radiation in the sewers and in the inventors just outside the outfall.

Remember my pre Fukushima, by a month, Palisades 2.206 request?

- 1) Request Palisades nuclear power plant and all Entergy nuclear power plants be immediately shutdown.
- 2) Request top Palisades Management staff be fired and replaced before startup.
- 3) Request Entergy's corporate nuclear senior staff be fired and replaced before the restart of the plants.
- 4) Immediately request two addition NRC inspectors to be assigned to Palisades plant, and to all the rest of the troubled Entergy nuclear plants. There seems to be a few plants of the bunch that behave themselves.
- 5) Request the formation of a local public oversight panel around every plant.
- 6) Request a emergency NRC senior official oversight panel with the aims of reforming the ROP.
- 7) Request a national NRC oversight panel of outsiders to oversee and report on the

agency's activities. There should be a mixture of professional academic people and capable lay people.

8) There is some heavy duty and exceedingly numerous findings of problems with Entergy plants' this inspection reporting cycle...do an analysis of why this is occurring.

9) Request a evaluation if NRC region III has enough personnel and resources
Now optimized it for Vermont Yankee for this 2.206?

- 1) Request Vermont Yankee nuclear power plant and all Entergy nuclear power plants be immediately shutdown.
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- 3) Request Entergy's corporate nuclear senior staff be fired and replaced before the restart of the plants.
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- 7) Request a national NRC oversight panel of outsiders to oversee and report on the agency's activities. There should be a mixture of professional academic people and capable lay people.
- 8) There is some heavy duty and exceedingly numerous findings of problems with Entergy plants' this inspection reporting cycle...do an analysis of why this is occurring.
- 9) Request a evaluation if NRC region I has enough personnel and resources
- 10) Request President Obama fire all the NRC commissioners!

Sincerely,

Mike Mulligan

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8/31/2011