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From: Vinod Arora [vinnie48in@gmail.com]
Sent: Thursday, May 02, 2013 11:00 AM
To: CHAIRMAN Resource; Leeds, Eric; Borchardt, Bill; Benney, Brian; Hall, Randy; Lantz, Ryan; Howell, Art; R4ALLEGATION Resource
Subject: Actions for Honorable NRC Chairman, Dr. Macfarlane on San Onofre

Sincere Thanks to NRC Chairman, Mr. Victor Dricks, Mr. Cale Young, Mr. Ryan Lantz, Mr. Randy Hall and entire NRC Staff. Thanks to NRC for posting this blog.

Jim Messina, Chair, Organizing for Action, for His Excellency, President of the United States, states, "I've spent enough time in Washington to know that the way you win a fight with the gun lobby, faced with some of the most powerful special interests, is just to refuse to give up." Following his example, 8.4 Million Southern Californians will keep questioning NRC and SCE, until they are convinced that SONGS Unit 2 is safe for restart. 8.4 Million Southern Californians pay for SONGS Unit 2, therefore, they are justified in expressing their concerns about their safety.

So far, all the available evidence indicates that the following major problems have not been addressed:

Problem Number 1. The design of San Onofre Replacement Steam generators (RSGs) are identical. SONGS Unit 2 potentially did not suffer in-plane fluid elastic instability due to operation at higher steam pressures and lower RCS flows (Rejecting the impact of double Tube-to-AVB contact forces and better supports responsible for prevention of Unit 2 FEI). SONGS Unit 3 suffered in-plane fluid elastic instability due to operation at lower steam pressures and higher RCS flows (Rejecting the impact of insufficient Tube-to-AVB contact forces and loose supports due to manufacturing errors responsible for Unit 3 FEI). This conclusion is consistent with Westinghouse Operational Assessment, but challenges the SCE, NRC AIT, AREVA and MHI conclusions. NRC AIT Report, SCE, MHI and AREVA conclusions on Unit 3 and Unit 2 FEI are incomplete, inconsistent, confusing and inconclusive and based on faulty computer simulations and hideous testing data (Shielded under the false pretense of MHI Proprietary information). The analysis in these reports does not meet the intent of NRC CAL ACTION 1, which states "Southern California Edison Company (SCE) will determine the causes of the tube-to-tube interactions that resulted in steam generator tube wear in Unit 3, and will implement actions to prevent loss of integrity due to these causes in the Unit 2 steam generator tubes. SCE will establish a protocol of inspections and/or operational limits for Unit 2, including plans for a mid-cycle shutdown for further inspections." Repeated requests to NRC, SCE and its Independent Experts to examine carefully the operational difference between Units 2 & 3 and determine its impact on CAL Action 1 have not been addressed to date. NRR has not asked SCE in its RAI(s) the impact of operational differences between Units 2 and 3 on Unit 2 and Unit 3 tube-to-tube wear. Honorable NRC Commissioner Mr. Apostolakis was very confused on Unit 2 FEI inconsistent and conflicting statements by SCE, Westinghouse and AREVA.

Required Action 1: To protect NRC Commission's Independent Public Safety Charter Mission, Honorable NRC Chairman is humbly requested that NRC Office of Inspector General retain an Independent Thermal-Hydraulic Expert to examine the operational differences between Units 2 & 3 during Cycle 16 and determine its impact on NRC CAL Action 1 by examining the entire SONGS Cycle 16 operational data for Units 2 & 3. Unit 2 Restart Permission at 70% power should be contingent on completion of the corrective actions required by NRC CAL Action 1 and 10CFR 50 Appendix B.

Problem Number 2. In light of massive amounts of tube damage (wear), fatigue and tube failure in Unit 3, along with incomplete tube inspections for detection of circumferential incubating cracks in Unit 2, NRC is legally required to ask SCE to check MHI Fatigue Calculations and post the results on its website before any approval

of SONGS proposed New License Amendment for restart of Unit 2, to demonstrate that the proposed license amendment (1) Would not involve a significant increase in the probability of an accident previously evaluated in the SONGS FSAR; or, (2) Would not create the possibility of a new or different type of accident previously evaluated in the SONGS FSAR; or, (3) Would not involve a significant reduction in the required margin of safety by operating Unit 2 at 70% power.

Required Action 2: Based on the above review, NRC should ask SCE to provide a calculation justifying the engineering basis of MHI Fatigue Calculations to meet the ASME Code, NRC RG 1.121, the NRC Chairman and its own Standards. The calculation should be performed by a California Licensed Mechanical or Civil Engineer and Independently Verified by a California Licensed Structural Engineer. In addition, SCE and its Independent Experts should address the synergic effects of tube-to-tube wear and high cycle fatigue, which can be caused by in-plane fluid elastic instability in Unit 2 during anticipated operational occurrences and design bases accidents.