

NRR-PMDAPem Resource

From: Paul Gunter <paul@beyondnuclear.org>
Sent: Tuesday, June 27, 2017 4:48 PM
To: Banic, Merrilee; Kim, James
Cc: Alan Muller; Burton/ Nancy; calta/ paxus; Day/Elena; Faye and Jerry Rosenthal; george crocker; Gray / Erica; Kraft/ Dave; Portzline/ Scott; Price / Scott; Tim Judson; Gunter/Linda; Kamps/ Kevin
Subject: [External_Sender] Additional supplement to January 24, 2017 Le Creusot emergency enforcement petition (10 CFR 2.206)
Attachments: creu_2206_sup_06272017.pdf

Hello Merrilee,

As our Petition Manager, please find attached the additional supplement to the January 24, 2017 emergency enforcement petition (10 CFR 2.206) regarding at-risk Creusot Forge components in U.S. reactors.

The attached supplement provides the June 26, 2017 Reuters story reporting the ASN finding that the installed Creusot Forge reactor pressure vessel head in Flamanville Unit 3 currently has a projected service life of just a few years should the reactor start up as presently scheduled for 2018.

The Petitioners assert that the reported short service life of the component identifies a potentially adverse-to-safety impact for U.S. reactors operating with installed at-risk components and further supports the Petitioners requested enforcement action for material testing.

Beyond Nuclear is endeavoring to obtain the referenced ASN document and provide it as an additional supplement.

Thanks,
Paul

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June 27, 2017

**Supplement to Emergency Enforcement Petition (10 CFR 2.206)
dated January 24, 2017 by Beyond Nuclear, et al, for Listed U.S. Reactors
with Forged Components and Parts Manufactured at France's Areva-Le
Creusot Forge and Japan Casting and Forging Corporation**

**ASN determination that the Creusot Forge Reactor Pressure Vessel Head
installed in Flamanville Unit 3 has a limited service life of just a few years
also affects U.S. reactors with at-risk Le Creusot components**

On behalf of the co-petitioners, Beyond Nuclear is supplementing the emergency enforcement petition dated January 24, 2017 with the news story "*EDF may need to replace Flamanville reactor lid in few years-ASN report*," recently published by Reuters News Service.¹ The Flamanville Unit 3 reactor pressure vessel head was forged at the Creusot Forge in France. Le Creusot has similarly provided large safety-related forged components to seventeen known operational U.S. reactors where the Petitioners have requested enforcement action including material testing for carbon segregation contamination.² Beyond Nuclear has additionally requested by supplement to the January 24, 2017 emergency enforcement petition (10 CFR 2.206) that the Nuclear Regulatory Commission (NRC) confirm that Le Creusot also provided the reactor pressure vessel head for the permanently closed Crystal River nuclear generating station and modify its license to also require destructive examination and material testing for carbon segregation.³

According to France's nuclear regulator, Autorité de sûreté nucléaire's (ASN) documentation obtained and reported by Reuters, "*The cover of the reactor vessel EDF is building in Flamanville, France, may not be able to function more*

¹ "EDF may need to replace Flamanville reactor lid in few years-ASN report," Reuters, June 26, 2017, <https://uk.reuters.com/article/edf-flamanville-nuclear-idUKL8N1JN2OC>

² Beyond Nuclear, et al, Emergency Enforcement Petition, January 24, 2017, http://static1.1.sqspcdn.com/static/f/356082/27425530/1485279930953/2206_le-creusot_us_01242017_fnl.pdf?token=skwck6B8dX0PX4J%2FJIT%2F5c5fMc%3D

³ Beyond Nuclear, et al, Supplement to the January 24, 2017 Emergency Enforcement Petition for U.S. Reactors with at-risk Areva-Creusot Forge components, June 16, 2017, http://static1.1.sqspcdn.com/static/f/356082/27601100/1498055292863/creu_2206_sup_06162017.pdf?token=yNHHdF4YZZXY7L9KJl4s%2F2%2BIYpQ%3D and June 22, 2017, http://static1.1.sqspcdn.com/static/f/356082/27608280/1498586880007/creu_2206_sup_06222017_irsn-doc.pdf?token=2JU0iNja9iwEw5cgFMbCcHEcEBM%3D

than a few years unless the utility can do additional tests which so far it has not be (sic) able to, nuclear regulator ASN said in a report.”⁴

The ASN document is reported to additionally identify, *“The (regulator) considers that the current cover of the Flamanville reactor is not fit for service in a permanent manner given the absence of sufficient non-destructive tests”* and *“EDF may have to replace its vessel cover soon after its scheduled start-up in 2018,”* according to Reuters.⁵

The Petitioners submit through this supplement that the ASN’s finding that Le Creusot Forge component installed in Flamanville Unit 3 *“is not fit for service in a permanent manner”* further identifies a potential adverse-to-safety impact on U.S. reactors operating with the at-risk components. The Petitioners submit that the ASN findings provide additional justification for their requested enforcement action to materially test for excessive carbon segregation in Le Creusot components installed in the seventeen operational U.S. power reactors and the permanently closed Crystal River nuclear generation station.

Beyond Nuclear is endeavoring to obtain a copy of the ASN document referenced in the Reuters story. Once in hand, the Petitioners will submit it as an additional supplement to the petition.

Sincerely on behalf of Petitioners,
---/signed by/---
Paul Gunter, Director
Reactor Oversight Project
Beyond Nuclear

Cc: Petitioners

⁴ Ibid, Reuters

⁵ Ibid, Reuters