

NRR-PMDAPEm Resource

From: Paul Gunter <paul@beyondnuclear.org>
Sent: Friday, June 30, 2017 12:54 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; Kamps/ Kevin; Gunter/Linda
Subject: [External_Sender] Supplement to Le Creusot Forge Emergency Enforcement Petition 01/24/2017
Attachments: creu_2206_06292017_sup.pdf

Ms. Banic,

As referenced in the June 27, 2017 supplement to the Le Creusot emergency enforcement petition (10 CFR 2.206), on behalf of co-petitioners, I am providing the ASN press release and technical documents establishing that the Le Creusot Forge reactor pressure vessel head installed in Flamanville Unit 3 has a limited service life. The Petitioners assert that this finding supports the Petitioners' requested actions for the seventeen U.S. operating reactors and the permanently closed Crystal River nuclear power station as supplement June 16, 2017.

Thank you,
Paul

--

Paul Gunter, Director
Reactor Oversight Project
Beyond Nuclear
6930 Carroll Avenue Suite 400
Takoma Park, MD 20912
Tel. 301 270 2209
www.beyondnuclear.org

Hearing Identifier: NRR_PMDA
Email Number: 3593

Mail Envelope Properties (CALTCGdkx2K7ZzDehsQgRZHvgeiFc7YCP-rS4Lu-SfVuE701nw)

Subject: [External_Sender] Supplement to Le Creusot Forge Emergency Enforcement
Petition 01/24/2017
Sent Date: 6/30/2017 12:54:04 PM
Received Date: 6/30/2017 12:54:13 PM
From: Paul Gunter

Created By: paul@beyondnuclear.org

Recipients:

"Alan Muller" <amuller@dca.net>
Tracking Status: None
"Burton/ Nancy" <NancyBurtonCT@aol.com>
Tracking Status: None
"calta/ paxus" <paxus.calta@gmail.com>
Tracking Status: None
"Day/Elena" <elena.day@gmail.com>
Tracking Status: None
"Faye and Jerry Rosenthal" <zipsbiz@gmail.com>
Tracking Status: None
"george crocker" <gwillc@nawo.org>
Tracking Status: None
"Gray / Erica" <veggielady@yahoo.com>
Tracking Status: None
"Kraft/ Dave" <neis@neis.org>
Tracking Status: None
"Portzline/ Scott" <sdportzline1@verizon.net>
Tracking Status: None
"Price / Scott" <sprice@apvonline.org>
Tracking Status: None
"Tim Judson" <timj@nirs.org>
Tracking Status: None
"Kamps/ Kevin" <kevin@beyondnuclear.org>
Tracking Status: None
"Gunter/Linda" <linda@beyondnuclear.org>
Tracking Status: None
"Banic, Merrilee" <Merrilee.Banic@nrc.gov>
Tracking Status: None
"Kim, James" <James.Kim@nrc.gov>
Tracking Status: None

Post Office: mail.gmail.com

Files	Size	Date & Time
MESSAGE	795	6/30/2017 12:54:13 PM
creu_2206_06292017_sup.pdf	231165	

Options

Priority: Standard
Return Notification: No

Reply Requested:

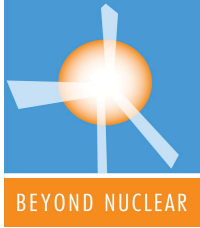
No

Sensitivity:

Normal

Expiration Date:

Recipients Received:



Beyond Nuclear
6930 Carroll Avenue
Suite 400
Takoma Park, MD 20912
Email: paul@beyondnuclear.org
Tel. 301.270.2209
www.beyondnuclear.org

June 29, 2017

Merrilee Banic, Petition Manager (10 CFR 2.206)
U.S. Nuclear Regulatory Commission
Washington, DC 20555
By email: Merrilee.Banic@nrc.gov and James.Kim@nrc.gov

Supplemental Documentation

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

Attaching ASN documentation that the Flamanville Unit 3 Creusot Forge Reactor Pressure Vessel Head has a limited service life that Petitioners argue also affects U.S. reactors with at-risk Le Creusot components

Ms. Banic,

On behalf of the co-petitioners, Beyond Nuclear is supplementing the emergency enforcement petition dated January 24, 2017 with the French Nuclear Safety Authority’s (ASN) June 28, 2017 press release and the two ASN documents entitled “Analysis of the consequences of the anomaly in the Flamanville EPR reactor pressure vessel head dome on their serviceability” and “Technical notice: Flamanville EPR reactor pressure vessel anomaly.” This supplement provides the technical documents referenced in the Petitioners’ June 27, 2017 supplement attaching the June 26, 2017 Reuters article about the same ASN technical report.

The supplemental documents translated into English are located at the following ASN link:

<http://www.french-nuclear-safety.fr/Information/News-releases/ASN-presents-its-position-regarding-the-Flamanville-EPR-reactor-vessel-anomaly>

The Petitioners draw the NRC Petition Review Board's attention to the fact that the ASN report identifies that carbon segregation anomaly reduces safety margins in affected components with respect to "fast fracture risk." The report further identifies that the affected Le Creusot Forge reactor pressure vessel head in Flamanville Unit 3 is determined to have a limited service life of seven (7) years due to the severity of the carbon segregation anomaly and the limited technical feasibility of inspections. The reactor pressure vessel head additionally requires the implementation of an enhanced inspection schedule.

The ASN press release supported by the technical documents states,

"However, the anomaly in the chemical composition of the steel entails a reduction in the margins with respect to the fast fracture risk. ASN therefore considers that EDF must implement additional periodic inspections to ensure that no flaws appear subsequently. ASN observes that such inspections can be performed on the vessel bottom head and therefore considers that they must be implemented.

However, the technical feasibility of similar inspections on the pressure vessel closure head is not established. ASN therefore considers that the use of the closure head must be limited in time. It notes that it would take about seven years to manufacture a new closure head, which could thus be available by the end of 2024. In these conditions, ASN considers that the current closure head shall not be operated beyond that date. [Emphasis added]

The Petitioners submit that the aforementioned ASN technical study and establishment of the Flamanville Unit 3 pressure vessel's limited service life of the Creusot Forge component support the Petitioners' requested actions in the January 24, 2017 emergency enforcement petition (10.CFR 2.206). The Petitioners requested actions include that the NRC modify the operating licenses of the seventeen (17) U.S. reactors with large at-risk Creusot components (reactor pressure vessels, reactor pressure vessel closure heads, steam generators and pressurizers) to require the material sampling testing for carbon segregation in metal samples harvested from the affected components.

The supplemental information further justifies the Petitioners' requested enforcement action as supplemented (June 16 & 22, 2017) to include that the NRC confirm Florida's permanently closed Crystal River nuclear power station reactor pressure vessel head was forged at Le Creusot Forge and modify the

license to require the destructive examination and material testing for the presence and extent of the same carbon segregation anomaly. The identification of the presence of carbon segregation would further necessitate the NRC to prompt material testing at the 17 operating U.S. reactors.

Sincerely on behalf of Petitioners,
---/signed by/---

Paul Gunter
Director of the Reactor Oversight Project
Beyond Nuclear

Cc: Petitioners