

9 Twin Orchard Drive  
Oswego, NY 13126  
June 13, 2003

Mr. John A. Grobe, Director  
Division of Reactor Safety  
US Nuclear Regulatory Commission  
801 Warrenville Road  
Lisle, IL 60532-4351

Dear Mr. John A. Grobe:

### **Bolting**

I am not comfortable with my current impressions of Davis-Besse bolting practice. I think that the maintenance staff has, in the past, indiscriminately tightened bolts on leaking equipment. Specifically, I think that this was the case on that valve that had two or three of four bolts corroded by boric acid (pressurizer spray, I think), and especially, the bolts (or nuts on studs) at the cover to casing joint of the reactor coolant pumps.

However, my basic information is sketchy on the reactor coolant pumps. I believe that I mentioned these to you or Christine as having "O" ring type gaskets, but the 7 page memo I read, (ADAMS number ML031530181), mentioned Flexitallic style gaskets.

I find the following bolting questions interesting:

Is any bolting controlled at Davis-Besse now or in the past?

Have any bolts or studs been replaced because of a change in original characteristics due to age, radiation, or overtightening? (An example might be the reactor head studs.)

Are there any currently calibrated torque wrenches at Davis-Besse?

Is there a currently approved procedure for the use of torque wrenches?

When is the last time QA/QC has documented an inspection of bolting?

Is any bolting considered a "skill of the trade"?

Have any bolt failures typical of over tightened bolts been identified at Davis-Besse?

What is the arrangement of gaskets for the reactor coolant cover to casing gasket(s)?

What type of gaskets are used?

Are the original design requirements of the gaskets in use being met?

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If "O" ring gaskets are used, do they have pressure equalizing holes in them that are not clogged?

Are the (cover and casing) surfaces on both sides of the gaskets plane within specified tolerances?

Are any recesses or groves for the gaskets filled with boron so that they do not provide adequate clearances?

What is the vendor specified life of the gaskets currently installed?

If I can buy a Briggs and Stratton engine from a local hardware store in Oswego, read the operating instructions, and not find a requirement to tighten the head bolts after 25 hours of service (or any other time), why would I expect to see a vendor suggestion at a nuclear site to retighten bolts after a few thermal cycles? (ML031530181) After all, they don't do that to the reactor head bolts, do they?

#### Primary reactor coolant leakage

I was disappointed to read, in either the March or April public meeting transcript that a leak through the first gasket of the reactor coolant pumps is not a primary coolant leak. I don't accept this line of thinking at all.

#### Criminal Investigations

What is taking so long? If the total loss of all structural steel in the reactor upper head does not reflect criminal behavior on the part of the plant operator, maybe it does someplace else.

This is letter twenty two. It needs no reply.

Thank you,  
  
Tom Gurdziel

Copy: D. Lochbaum

9 Twin Orchard Drive  
Oswego, NY 13126  
May 29, 2003

Mr. John A. Grobe, Director  
Division of Reactor Safety  
US Nuclear Regulatory Commission  
801 Warrenville Road  
Lisle, IL 60532-4351

Dear Mr. John A. Grobe:

I have reread the "Safety Culture Evaluation of the Davis-Besse Nuclear Power Station", dated April 14, 2003. I have these comments:

Comment 1 (page 7) In a time when people are working 7 - 10s or 6- 12s, 8% of the people could or would not take one hour for an interview. I imagine the hour was not unpaid. Did you note the departments they were to come from?

Comment 2 (page 8) About 20% of the permanent station employees did not complete an important paper and pencil survey.

Comment 3 (page 10) Listed under Areas for Improvement is the following: "...the Quality Assessment Group perceives, to a greater extent than other groups, that 'making work for others' is valued within the organization." I consider this a strength, as I understand this usage. And, I might add, I have been familiar with QA/QC from the summer of 1972 when I hired on to help build my first nuclear plant. (I was the United Engineers & Constructors area engineer for the Unit 2 Containment at 3 Mile Island. (This was the containment that later passed its unscheduled operating pressure test.))

More precisely, the workers who do the job wrong, (and get paid for their work), make more work for themselves and get paid again. Similar comments apply to their supervisor(s), and the managers above. The QA people simply do their job when they identify deficient work.

Comment 4 (page 9) I am intrigued by the idea that Davis-Besse people have a very high score "on the Perfectionistic Scale"..

Would perfectionists put in only 5 of 12 bolts on a polar crane electric panel and expect not to get caught?

Would perfectionists accept totally eroded away ductwork for containment air cooling?

Would perfectionists refuse to accept indications from their reactor leakage detection instrumentation?

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Would perfectionists remove an experienced boron leakage surveillance lead engineer and send him to service water?

Would perfectionists train the newly assigned lead system engineer looking for reactor leakage AFTER he did the inspection?

Would perfectionists remove reactor head washing equipment before the reactor head was perfectly clear of boron/residue?

Would perfectionists announce at a public meeting that they added one ring of packing on a leaking valve (instead of replacing all the existing packing) with the plant already down for an outage?

Would perfectionists refuse to follow vendor recommendations to repair all reactor coolant pumps with reactor primary coolant O ring leakage, not just the easiest two?

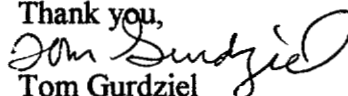
Would perfectionists originally propose pressurizing the reactor vessel and NOT also looking for leaks then?

Would perfectionists fail to wear prescribed equipment inside a steam generator, or even safety glasses inside the Containment Building?

Would a perfectionist organization refuse to shut down its reactor to answer questions about its safety?

Would a perfectionist crane crew fail to lift machinery above the nozzle before moving it, thus providing better reactor nozzle surveillance than everyone in the QA & review organizations at that time?

This is letter twenty one. It needs no reply.

Thank you,  
  
Tom Gurdziel

Copy: D. Lochbaum