

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