

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

Date Printed: Dec 12, 2003 11:11

PAPER NUMBER: LTR-03-0782

LOGGING DATE: 12/11/2003

ACTION OFFICE: EDO

To: Dyer, NRR

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SUBJECT: FENOC integrated report to support restart of the Davis Besse nuclear power station

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ACTION: Appropriate

DISTRIBUTION: Chairman, Comrs

LETTER DATE: 11/25/2003

ACKNOWLEDGED No

SPECIAL HANDLING: Made publicly available in ADAMS via SECY/EDO/DPC

NOTES: OCM #3992

FILE LOCATION: ADAMS

DATE DUE:

DATE SIGNED:

Chairman WILS J. D:22

399.2

FYI

Tom Gurdziel

Tom Gurdziel

CHAIRMAN REC'D

From: Tom Gurdziel [tgurdzie@dreamscape.com]
Sent: Tuesday, November 25, 2003 11:39 PM
To: Christine Lipa; opa3@nrc.gov; opa@nrc.gov
Cc: Richard W. Lamoreaux; Rep. Marcy Kaptur; Jim Mackinnon; J. Mangels; J. Funk; Ed Stronski; David Lochbaum
Subject: FENOC Integrated Report to Support Restart of the Davis-Besse Nuclear Power Station

03 DEC -9 PM 1:35

Good morning,

Nobody signed their approval.

page viii SSCs Isn't this usually considered to be Structures, Systems, and Components (bigger to smaller), not Systems, Structures and Components? Why are these switched?

Page 2 Containment Health Assurance

I don't accept the statement "that the condition of the SSCs within containment supports safe restart and operation" until there is considered the addition of pressure relief valves to relieve overpressure of water in the CAC system.

page 3 Corrective Action Program There is no mention of additional funding for these actions. (Doing plant work costs money. And, physical work cannot be done if sufficient resources are withheld, for example, "mouse hole" enlargement.

page 3 BACC Program Note that changing the program owner was done before (with Andrew S.) This step was not successful. There is no promise to allow sufficient time (and resources such as scaffolding), to do complete inspections, which was also a problem in the past.

page 4 Radiation Protection There is no mention of penalties for failure to meet expectations, (or even for poor work habits, like failure to wear safety glasses where specified unless identified by NRC staff.)

page 5 7. Modifications,... Replacing the casing-to-cover gaskets should have been done on all 4 RCPs in an organization with a proper safety outlook and 21 months (so far) of outage time. (Recall that the organization publicly misidentified the number of hours between vendor recommended pump shaft inspections, (approximately 175,000 hours), as the time for pump inspection in general.) What is the vendor recommended time between replacement of these gaskets?

page 6 RCS Integrated Leakage Program There is no date given as to when sensitivity test lessons learned will be incorporated in this program, such as prior to restart.

page 13 Event Chronology When Davis-Besse decided to repair five nozzles, did they first look to see if the metal behind the nozzles (the upper reactor head), was still in acceptable condition for the repair to be used?

It would have been more direct to say, as a result of improper crane operation, the top of the nozzle was pulled sideways, tilted, and then was discovered. How many other repaired nozzles experienced side loading from similar crane operation? Notice by saying it this way, it is clear that inspection did not find the cavity.

page 18 Compliance with BACC Procedure... After "boric acid was not completely removed from the RPV head" add: but was reported to employees (at least), that it was. (Wasn't Andrew S. praised?)

page 18 Lack of Hazard Analyses This wouldn't matter if the required work had been done.

page 18 Corrective Action Program Procedure It wasn't the procedure that kept upper reactor head inspection work from being done, it was the too early removal of scaffolding, wasn't it?

Well, I have finished reading to page 24 tonight. I didn't see the Management Root Cause clearly labeled as such. Is it the one in Section III C. at page 17?

There is also something else. I believe that people will respond to the desires of their leaders. So, if you see shoddy, incomplete work, it is probably because the workforce feels that is what is desired. I believe we have seen that here to cause this problem years ago. Frankly, I don't know if it is fixed yet.

I look at published articles, (I admit of unknown truthfulness.) One tells me that FirstEnergy paid a fine because they renovated a powerplant, (fossil, I think), but didn't follow the requirement that they upgrade something, I think it was their plant emissions.

Another tells me that they played a major part in causing the August 14, 2003 blackout that cost my home in New York electric power for 6 hours, and that of my mother in New Jersey for 4. They didn't cut trees, they didn't have computer alarms, they didn't know they didn't have computer alarms, they didn't believe others telling them they had problems, they didn't have a wall display of their system as is typical for others. They don't take any responsibility.

I read in another place (daily NRC Event Reports) that they even had a fire in a transformer this year, and the plant doesn't even operate. (Three Mile Island, Unit TWO.)

Beaver Valley has reported river water pump problems this year, (daily NRC Event Reports) and I recall from my nuclear plant days that they were having problems with their river water pumps in the 1980s, (because we had to look at ours that were similar.)

I don't know about you, but I haven't read anything so far that that wouldn't work if Lew Myers and everybody below worked for Entergy or Constellation, Dominion, or somebody else. Thus, I am opposed to the restart of this plant under FirstEnergy ownership. They should have the license pulled if they can't transfer it to another, unrelated owner.

This is e-mail #1, I don't need a reply.

Thank you,

Tom Gurdziel