

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

In the Matter of:	)	Docket No. 50-346-LR
FirstEnergy Nuclear Operating Company	)	April 14, 2014
Davis-Besse Nuclear Power Station, Unit 1	)	

**DECLARATION OF VICTORIA CLEMONS**

Under penalty of perjury, I, Victoria Clemons, declare as follows:

1. I am a citizen of the State of Ohio, am over eighteen (18) years of age and am not under a disability.
2. On March 25, 2014, I attended the afternoon session of a Nuclear Regulatory Commission-sponsored public comment session on the draft Supplemental Environmental Impact Statement for the renewal of the operating license for the Davis-Besse Nuclear Power Station, Unit 1. This took place at Camp Perry, a military base near Davis-Besse.
3. Prior to commencement of the comment session, I approached NRC Staff person David Hills, who was present as part of the Staff for the session, and asked if I could speak with him about the concrete void or “honeycomb” discovered in February 2014 in the Davis-Besse shield building wall. Mr. Hills was identifiable by me from a tag he was wearing. I was interested in having the NRC hold a public meeting on the honeycombing just as the agency had done in 2012 after discovery of laminar cracking of the shield building.
4. After explaining the procedure and the cutting of the wall, Mr. Hills said that “Two years ago, in 2011, when the concrete molds or forms were removed they (FirstEnergy) found

gaps on the outer wall of the shield building” He then explained “that the hole/gap on the outside of the wall was filled and repaired,” and that, “they (FE) had decided to leave the forms on the inside wall because they knew they would have to cut through them again in 2 years.”

5. I was surprised to hear this. I asked him, “Wasn’t that a red flag?” and “Shouldn’t they have checked the inside wall then?” I asked, “Who inspected the wall?” and whether the NRC had inspected it.

6. Mr. Hills responded “Yes, it should have been a red flag. We are looking at that as well in the root cause and the procedures that followed. Who and how it was inspected.” Mr. Hills said that “We (NRC) are asking why they did not check the inside wall after finding the outside void.”

7. I remember him then qualifying or justifying his statement by saying, “Maybe they determined it was safe ... because they did determine it to be safe now,” or words to that effect.

8. Mr. Hills went on to explain the problems with the rebar: “The rebar was damaged during the cutting of this opening [2014]” and, “The hydro saw damaged the rebar.” Mr. Hills explained further, “The reason seems to be that there is a problem at the area of the splice of the rebar from the last cut.” He explained that the rebar is crimped and clamped and that there appears to have been a stress on the rebar splice, and that it is a problem “unseen” before. He said that the NRC “would be deciding on how to proceed in the future and before closure [of the shield building].”

Victoria A. Clemons  
Victoria Clemons

4/14/2014  
Date