

From: <Coatingsvm@aol.com>
To: <JGL1@nrc.gov>
Date: 5/28/02 9:17AM
Subject: Comments on GSI-191 Action Plan by NRC

Mr. Lamb,

I received a letter from Mr. S. Singh Bajwa summarizing, somewhat, the status of GSI-191 and I also have reviewed the subject action plan. I feel that the NRC is making progress in understanding my concerns. Mr. Bajwa's conclusion that there is a potential danger from ECCS clogging from debris, including coatings, has been my concern for some time.

I will make some comments in writing later re: details of the action plan. In the meantime, I know there is another public meeting scheduled this week. I have a full time engineering job, not related to coatings, and I will not be able to attend that meeting, either.

Generally, at this point I have two areas of concern about the issue. 1) I don't think the potentially, very large quantity of debris (both fine particles, chunks, and delaminated layers, or sheets) has fully been considered. My testing experience on "qualified coatings" sometimes resulted in the bottom of the test autoclave being full of all those different types of debris, and in large quantities considering the small amount of tested coatings. 2) I have little confidence in the licensees' being responsible for "evaluating themselves", or determining if they potentially have an ECCS clogging issue. I hope you and the others at the NRC have these same two concerns, or at least consider them as credible possibilities.

I suggested to Mr. Bajwa, the use of in-situ testing technology, which I had a part in developing, a few years ago, and I believe would be a very valuable tool for evaluating these Level I coatings' problems. I can think of several ways it could easily be used by a contractor(s) at locations (both selected by the NRC, as appropriate) to evaluate existing conditions, while checking the plants'/inspectors' performance. The information and insight into expected LOCA/DBA performance by existing coatings would be invaluable for future planning, as well as scientific input to GSI-191 deposition.

Please consider these comments, and let me know if I can be of help. I will work with you and the NRC in any way to improve the safety of our nuclear plants. Thanks, Lanson Rogers

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