

July 24, 2002

S. Singh Bajwa, Director  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: RESPONSE TO LETTER DATED JUNE 27, 2002, AND EMAIL TO JOHN LAMB DATED JULY 12, 2002, REGARDING GENERIC SAFETY ISSUE 191, "ASSESSMENT OF DEBRIS ACCUMULATION ON PRESSURIZED WATER REACTOR SUMP PERFORMANCE"

This is a follow-up to your last letter to me, dated June 27, 2002, and to my email to John Lamb of June 12, 2002. Apparently little, if any, progress has been made toward closing the ongoing issues of GSI-191, and the related ECCS concerns.

As you pointed out in your letter, I have not brought any new issues or opened new concerns, only readdressed old ones. The main reason that the old issues are still open is that the root cause of the problem is still unaddressed. In the automotive and manufacturing industry, it is termed the "Global 8d Root Cause", and in the case of the GSI-191 issues, it is very obviously flawed Level 1 coatings. There are many reasons for the flawed coatings, and these have been discussed and excused for many years, and at this point, the only thing that is important is that they are flawed. The other thing that is important is that scientific testing and years of scientific evidence show that flawed paint will delaminate under extreme environmental conditions, such as would occur in a LOCA/DBA. Your NRC Los Alamos lab tests further indicate that only 12 pounds of debris from paint would cause problems in many plants. Realistically, there will be hundreds of pounds, rather than 12, in any plant since there are thousands of gallons of paint inside every containment.

I realize that the NRC is conducting "Public Meetings" on this subject on an increased schedule, maybe monthly, and that they are keeping the plants informed of the GSI-191 and ECCS-related concerns. Weekly meetings and no amount of paper changes in procedures, inspections, maintenance programs, or anything else will correct this problem. The ROOT CAUSE must be corrected, and it must be corrected by taking the flawed paint OFF. Covering it up with more paint only adds to the cumulative total of debris which will contribute to more ECCS interference. Having increased "condition assessment" inspections, BEFORE a LOCA/DBA proves nothing, and avoids the root cause, or ignores it.

YGC

S. Bajwa, Director

On a personal note, I worked at Ford when the Firestone tire issue unfolded. Ford and Firestone learned, very painfully, that the root cause of accidents was flawed tires. They both tried for months to just make it go away by blaming each other, peoples' driving, etc., but it only got worse. They both finally had to painfully deal with their root cause, i.e. flawed tires. The NRC and the plants can push this issue around, but it will not go away, until the plants are forced to deal with their flawed coatings which have been in place, and getting worse, for many years.

This will be my final response, at least until events, or actions, change. I hope that will be before an accident exposes the root cause, never addressed.

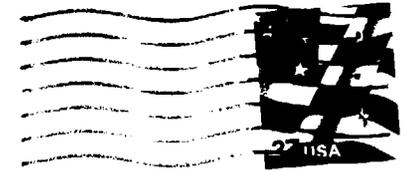
Sincerely,



Lanson Rogers

cc: File

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