**From:** <Coatingsvm@aol.com>
**To:** <JGL1@nrc.gov>
**Date:** 7/12/02 9:30AM
**Subject:** Ongoing GSI-191 Action Plan

Mr. Lamb,
I received a letter from your S. Singh Bajwa, Director, in which he indicated that the GSI-191 issue continues being addressed. In the manufacturing industry across our country and around the world, there is a Global 8D process for addressing such problems as is presented in GSI-191. The Global 8D "Root Cause" would obviously be flawed Level I coatings, or simply, bad paint. There is nothing that can be done in public meetings, Generic Letters, changing rules and requirements, or anything else performed in offices, which will get rid of this root cause, i.e. the bad paint. At some point, some workers are going to have to go in and remove the bad paint. Until that is done, it will always be a threat to ECCS and the safety of all plants with the bad paint. All scientific testing and other data plainly shows that flawed paint, regardless of why it is flawed, will delaminate in a LOCA/DBA, and it will take all subsequent topcoats of material off with it. Your NRC-Los Alamos report says that 12 pounds of debris from coatings will cause problems in 30 of 59 plants, and that only represents one gallon of typical epoxy used in most plants. Hundreds, and possibly thousands of pounds can easily be generated in many of our plants, and just how that will affect ECCS has not even been addressed. The next step in the Global 8D process would be to identify the exact location(s) and extent of the root cause, or bad paint. The plants should have already been forced to do that, and should either be shut down, or forced to operate at less than full power, or something to get their attention, and bring about immediate results, and changes.

I will put this in writing and hopefully the NRC will see the need to force nuclear power plants to make changes, physically, to what is causing, or can cause, very serious consequences in an accident. Until then, ECCS is in a threatened state, and one I see no excuses for, with existing technology. There may be some questions still to be answered about protecting the plants from outside terrorists' threats, etc., but they can be as prepared, internally, as is posssible; and they are not.

Sincerely, Lanson Rogers

**CC:** <Michal.Freedhoff@mail.house.gov>

ENCLOSURE 2