From: Margie Kotzalas NRR
To: Allen Hiser; Douglas Kalinousky; Ian Jung; Jacob Zimmerman; James Medoff; Jay Collins; Keith Wichman
Date: Wed, Sep 12, 2001 3:58 PM
Subject: Staff Comments on Davis-Besse Bulletin Response

The attached summary contains the staff's comments on the Davis-Besse Bulletin response. Please let me know if you have any comments or corrections.

Margie

NRC INTERNAL USE ONLY NRC INTERNAL USE ONLY

September 12, 2001

STAFF QUESTIONS AND COMMENTS ON BULLETIN 2001-01 RESPONSES FROM FIRSTENERGY ON DAVIS-BESSE

ATTACHMENT 1

1) [pages 4-5] "A qualified visual examination of the RPV head will be performed during 13RFO, which is currently scheduled for April 2002....Personnel performing this task will be instructed on the type of unacceptable conditions using ONS3 as the basis. Inspections will be performed in accordance with a procedure developed specifically for these examinations that will meet the basic requirements of an ASME VT-2 inspection, and will not be compromised due to any pre-existing boric acid crystal deposits."

Comment: The licensee did not identify what the scope of expansion would be for inspection of the CRDM nozzles if evidence of leakage is found.

2) [page 5] "The acceptance criteria to be used will consist of comparative evaluations of any as-found boric acid crystal deposits to photographs of leaking CRDM nozzles observed at ONS3 and Arkansas Nuclear One-Unit 1 (ANO-1) and evaluation against any identified leaking CRDM nozzle flanges. The cracks leading to the leak will be characterized by supplemental examination and the nozzle will be repaired."

Comment: The new NRC CRDM flaw acceptance criteria drafted by K. Wichman should be used. This criteria will probably be forwarded to the industry (i.e., NEI) to facilitate dissemination of the information.

3) [page 5] "The FirstEnergy Nuclear Operating Company (FENOC) proposes to provide a final response to NRC Bulletin Request 3.a by January 29, 2002 (60 days before the start of 13RFO scheduled for the spring of 2002). Final plans will be based on the inspection results from other facilities, the ongoing work of the MRP, and the advancement of NDE technology and development of remote tooling adequate to perform effective and timely surface or volumetric examinations from underneath the RVP head."

Comment: The staff has determined that providing a final response by January 29, 2002, is acceptable.

4) [page 6] "During final Quality Assurance inspection, CRDM bores were inspected for final top and bottom bore diameter and verticality. After individual CRDM nozzle shaft custom grinding to approximately 0.001 inches greater in diameter than the final CRDM bore diameter, CRDM nozzle shafts were also measured at both the top and the bottom of the custom ground length. CRDM nozzle shafts are longer than CRDM bores are deep. Thus, CRDM nozzle shaft diameter measurements do not directly line up with CRDM bore diameter measurements, although in the case of the DBNPS these locations should be fairly close because of the lack of counterbores. Therefore, the

resulting top and bottom dimensional fits are considered approximate."
Comment: A graphical description of the above paragraph would be helpful for the staff's understanding of the licensee's statements.

5) [page 13] "The design shrink fit of the CRDM nozzles at the DBNPS is similar to the design shrink fit of the ONS units indicating that through wall cracking of the nozzles of the magnitude seen at ONS should provide visually detectable evidence of leakage on the RPV head."

Comment: The licensee made this determination by considering the "design" rather than the "as-built" shrink fit of the CRDM nozzles. The general comparison of design shrink fits of ONS' and DBNPS' nozzles may not be appropriate.