

From: "Dave Lochbaum" <dlochbaum@ucsusa.org>  
To: Peter Wilson,  
Subject: Davis-Besse Risk Assessment  
Date: July 1, 2002

Hello Pete:

Steve Long suggested I contact you with my concern regarding the Davis-Besse SDP worksheets. I found the SDP worksheets (attached) in ADAMS. This 49-page document (including transmittal letter, cover sheet, and table of contents) refers to the Davis-Besse IPE at least 34 times. It has only two references: the Davis-Besse IPE submittal of March 1993 and SECY-99-007A (which asserted that the reactor oversight process will be scrutable and transparent).

I went to the NRC Public Document Room last Friday afternoon to examine the Davis-Besse IPE submittal. After all, it was referenced on almost every single page of the NRC's SDP worksheets. I wanted to examine the source document. But the NRC will not allow the public to look at this document any more.

Among the specific things I wanted to examine in the Davis-Besse IPE submittal was the loss of offsite power (LOOP) treatment. Note (1) to Table 2.7 of the NRC's SDP Worksheets for Davis-Besse stated:

"The IPE does not provide much information about LOOPO event tree. It does not have a LOOP event tree. No discussion on battery capacity in a SBO is available. No recovery of offsite power model is discussed. No dominant sequences is [sic] associated with LOOP or SBO. This SDP worksheet and associated LOOP event tree are borrowed from ANO-1."

I'm not sure which I find more incredible - that the Davis-Besse IPE did not model loss of offsite power or that NRC would cut and paste the LOOP analysis from ANO-1 into Davis-Besse's SDP. Then again, the tornado that hit Davis-Besse in August 1999 to cause a loss of offsite power did not result in core damage at ANO-1, so maybe it all worked.

UCS believes that the Davis-Besse IPE is deficient if it does not model loss of offsite power. UCS believes the NRC's SDP worksheets for Davis-Besse are deficient if they purloin numbers from ANO-1.

Does the NRC staff agree with UCS on these two points. If not, why not? If so, what will NRC do to remedy the matter before restart?

Thanks,

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cc: Francis Cameron, John Grobe, Mindy Landau, Steven Long,

Attachment: dp-sdp-worksheets.pdf