

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,

Dave Lochbaum
Nuclear Safety Engineer
Union of Concerned Scientists
1707 H Street NW Suite 600
Washington, DC 20006-3962
(202) 223-6133 x113
(202) 223-6162 fax

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

Attachment: dp-sdp-worksheets.pdf