

B-2360

From: Brian McCabe
To: Stacey Rosenberg
Date: 11/26/01 4:01PM
Subject: Re: Davis Besse Order

~~Proprietary~~

Sounds good Stacey.

Thanks
Brian

>>> Stacey Rosenberg 11/26/01 03:58PM >>>
Brian,

The meeting with the licensee on Wednesday is still tentative. Therefore, I forwarded your questions to the staff and I should have answers back for you by Wednesday. Also, I sat in on a conference call today at 1:00pm with FENOC. Steve Moffitt, Plant Manager, indicated that they could shut down for refueling on February 16th at the earliest and would prefer to couple the CRDM inspections with the RFO. He also indicated that starting in mid-December, they could operate at a lower head temperature of 598 degrees F (instead of 605 degrees F). The staff is in the process of analyzing this information and has not yet decided on its acceptability. I will continue to keep the Commissioner TAs up-to-date with the latest information.

Thanks,
Stacey

>>> Brian McCabe 11/26/01 12:26PM >>>
Stacey

Thanks for bringing the Order up this morning. Based on the information you provided, it is my understanding that 1) the staff and FENOC are trying to set up a meeting on Weds and 2) the Order will not be issued prior to Friday. When you finalize the Weds meeting, could you email me the meeting time/place? Thanks

I appreciate the staff's efforts on the Order. I do have several questions regarding the Order. Some of my questions may be addressed at Weds meeting so there is no need for the staff to respond at this time. However, I was wondering how you would propose I discuss the remaining Qs with the staff post-Wed's meeting?

The Commission could be called upon to articulate the basis for the DB Order to stakeholders and I just want to make sure Commissioner Merrifield has the information he would need to do so.

Some questions/comments I have include:

1. The staff's basis for the Order is not entirely clear to me. Which of the following reasons is the primary basis for the Order?:

a) it is highly probable that DB is currently experiencing pressure boundary leakage and is operating in violation of its TSs? (pg 10)

b) the level of cracking that has been found at similar facilities, if not promptly corrected, could result in a gross failure of the RCS pressure boundary and consequently a loss of coolant boundary. "Such a failure would result in a significant decrease in the assurance of adequate protection of the public health and safety". (pg 3)

or

~~Proprietary~~

c) Failure of DB to inspect in the manner supported by the staff is inconsistent with the 3 GDC referenced by the staff (pg 13/14)?

2. On page 6, the staff indicates "Performance of the recommended examinations of all vessel head penetration nozzles is expected to provide reasonable assurance that a crack of significant size does not exist." Going back to #1, this statement is a little confusing. As I understood the staff from our last briefing, our standard for questioning continued operation is not "crack of significant size", our standard is "any crack". If I am correct, why are we focusing most of our attention in the Order on crack size? If my understanding is incorrect, what is the threshold for "significant"?

3. Given that the staff has concluded that "ASME Code requirements are not adequate to detect degradation in the nozzles", it is not clear to me how even the low and medium susceptible plants meet the GDC discussed on pgs 13 & 14. Please clarify. Thanks

4. On page 3 of the Order, last sentence. "... if left uncorrected in a prompt manner, could result in gross failure of the reactor coolant pressure boundary in the form of a vessel head penetration nozzle failure, and consequently a loss of coolant accident." Yet, on Page 7 of the Order, the staff summarizes the cracking to date and indicates that "The results of these inspections have not revealed conditions of incipient failure." Does the staff have a technical basis that shows why Dec 31st is prompt enough but Feb/March is not "prompt" enough, especially since none of the inspections to date have revealed conditions of incipient failure?

5. Could you help me better understand the basis for allowing the deferral of inspections at DC Cook?

Thanks so much.

Brian

CC:
Hiltz

Darrell Roberts; James Beall; Joseph Shea; Michael Tschiltz; Rick Croteau; Thomas