

**From:** <Coatingsvm@aol.com>  
**To:** <JGL1@nrc.gov>  
**Date:** 1/11/03 11:25PM  
**Subject:** GSI-191, Generic Safety Issue

Mr. Lamb,

Continued public attention to terrorists' threats and the New York Times article on the ineffective controls by the NRC keep me focused on the proper closure of GSI-191.

While your last letter to me would indicate that you feel this issue is being handled properly, I feel that the fact that the issue has been open for many years would be proof enough that it has not been handled properly since its beginning.

You stated that "the NRC has extensively tested and analyzed the failure of con-

tainment coatings.....in the absence of other types of debris (e.g. insulation), are unlikely to clog ECCS sumps. However, the GSI-191 study.....concluded that sump clogging is a credible safety concern for PWR plants; therefore, we are..."

Since this safety issue, after many years and who knows how many millions of dollars in testing and studies, is still open, the NRC has been ineffective in the handling of it, and in its proper closure.

I would like to again point out that all testing and analyzing by the NRC and the plants, and others re: safety-related coatings has been done on "qualified" coating systems. Therein, lies the basic problem. As you have reported many times, many failures have been reported at the plants with qualified coatings, and it (failure) usually is attributed to improper application (e.g. too thick, too thin, or improper surface preparation) procedures. So, these conditions and others, would move these coatings to the category of "unqualified" coatings, on which virtually NO testing or analyses has been performed - my ongoing concern. The assumption is that most containment coatings are qualified, the reality is most containment coatings are unqualified. You always want me to give "specifics"; there are none because no one has ever looked from this perspective, and if they have they have gone unreported, either of which is a very dangerous safety (ECCS) possibility.

I would again urge the NRC to consider IN-SITU testing as the proper approach to a final closure to GSI-191. It would offer complete control of the evaluation to be done by the NRC, or directly with their oversight. It would take the judgement away from the plants and the special-interest-inspectors, all who have personal gains to be made by continuing the "walk downs". This in-situ testing would evaluate the coatings as they exist NOW, after years of radiation exposure, and would consider that most or a large portion of them were improperly applied, or improperly qualified, improperly repaired, or whatever. The results would stand alone and be conclusive. The NRC would

know if, in fact, the plants and their "inspectors" are in control, or not.  
It would be a final and positive closure to GSI-191, and be done and managed  
by the NRC, as it should be, and not by others.  
If appropriate, Level I coatings could be "de-classified" and deemed not  
safety- related at all, as the testing would indicate.

Please consider, again, my concerns, and contact me for any help or more  
information. Thanks, Lanson Rogers

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