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9 Twin Orchard Drive
Oswego, NY 13126
September 17, 2002

Mr. John A. Grobe, Director
Division of Reactor Safety
US Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Dear Mr. John A. Grobe:

In this letter, I am attempting to present some things in the industry that bother me and that may also be a problem at Davis-Besse.

Item 1 Do it right the first time. This philosophy puts tremendous stress on people attempting to do new things. In fact, I believe that I saw a very good explanation in ADAMS this year by somebody associated with Millstone. I feel that if "Do it right the first time" is adopted at a plant, it should be made very clear that it applies only to repetitive assignments.

Item 2 Non safety related Why do we need this designation for equipment at a nuclear plant? All it does is ensure that such designated equipment gets overlooked. If it is on a nuclear plant site and is broken, get it fixed.

Item 3 Maintenance Rule Is the good it is doing worth the cost? (I know there was a letter or memo in ADAMS this year to the NRC Chairman that says the Maintenance Rule is working. I just don't believe it.)

Item 4 Risk Informed anything What is the sense of doing any risk analysis if the NRC ALWAYS states that there is only a small increase in risk and thus the organization can do what it wants. Note that this ALWAYS means increasing risk to the unknowing public since the stipulation that overall risk must not increase, (which used to exist somewhere and would have required compensating mitigating action(s)) has been removed. In other words, it no longer costs the plant operator anything to increase risk to the public.

I read every speech I could of Shirley Jackson when she was Chair, and I appreciate more each day ADAMS, which she promoted. But, I am not happy with the idea that "risk informed" now seems to overpower "defense in depth."

Item 5 INPO plant inspections Although they may provide much value in non-operations areas, I don't see the same in their PWR, NRC Region 3 plant operations visits based on Davis-Besse. If they can't find substantial problems existing for years, why visit? Also, where else did the teams that visited Davis-Besse visit and award the same rating?

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Item 6 System Engineers I believe that an organization that had functional specialists in compressed air, electric motors, pumps, welding, piping systems including vents and drains, ventilation, and so on could be better prepared to meet the needs of the power plant with an overall smaller staff. The operators would individually be assigned specific systems.

Item 7 Economy of scale Who needs any plant bigger than 600Mwe that can't follow load? Why should any plant employee, (including those at Davis-Besse), be embarrassed to state that they work at a stand alone plant? If bad performance does occur at one plant run by a nuclear operating company, doesn't it follow that somebody should be looking closely at their others?

Item 8 Operator Work arounds To me, this is just a way to avoid fixing equipment.

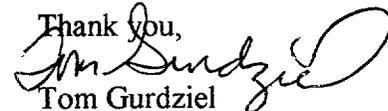
Item 9 Any operator verification beyond double To me, triple valve position verification is time consuming, but worst still, it obscures accountability.

Item 10 Office of US NRC Inspector General Based on my (non Davis-Besse) experience with them this year, I have concluded that they are ineffective.

Item 11 12 hour shifts for operators They are too long.

Item 12 Non cited violations for non (PSC) regulated plants Do they work? I don't think so.

This is my sixth letter. It needs no reply.

Thank you,

Tom Gurdziel

Copy: D. Lochbaum