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Oswego, NY 13126  
October 4, 2002

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

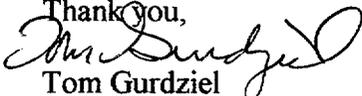
Dear Mr. John A. Grobe:

I think it might be important to consider the tube rolling process that was used at the Davis-Besse PWR. As I recall the description, the tube rolling device was being removed from a CRDM tube (nozzle), in a not-perfectly-vertical movement. The lateral part of the movement caused displacement of the CRDM tube into a reactor head cavity.

What were the specified conditions for acceptance of tube rolling? Specifically, was the tube rolling device being removed because it had successfully met the imposed requirements? If so, a tube rolled against nothing was able to meet the imposed quality requirements and there is something seriously wrong.

Also, are there any penetrations at the bottom of the reactor vessel that were rolled (at any time) using the same method and quality requirements?

This is my eighth letter. It needs no reply.

Thank you,  
  
Tom Gurdziel

Copy: D. Lochbaum