

9 Twin Orchard Drive
Oswego, NY 13126
October 24, 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:

Nuclear Safety First?

When only 39% of 1/3 of all the Davis Besse company employees feel that the new management is more interested in nuclear safety than schedule, there is a problem. But right now, there is an opportunity, too. I think that the survey should be given again and it should be given by a separate organization to both the company employees and the contractor employees before any cutbacks begin. If the surveys are tabulated separately, you will be able to see if at least 400 of the 800 company employees say that management feels nuclear safety is more important than schedule. Results will also be available for the contractor employees.

If both groups give favorable responses, maybe the place is turning around. If one group gives a favorable response, maybe the cuts should come from the other group. Finally, if both groups are unimpressed with the new management, maybe it needs to be changed again.

Cost of the 0350 Effort

I don't think that U.S. taxpayers should be burdened with the cost of the Davis Besse 0350 effort after 12 months. At that time, all costs PLUS a mark up should be charged to the plant operator monthly. I would hope that the mark up would at least equal any present markup FENOC currently is entitled to in Ohio.

Program Check

How do you check that programs are under control? Well, I suggest that one program be selected as a sample of all the others. Why not choose the program that includes worker safety when using overhead cranes? Here's what I suggest: have the State of Ohio send inspectors to check one overhead crane. Choose the Turbine Hall overhead crane. Let's see if FENOC is concerned with worker hoisting safety by providing them with safe, documented/inspected cranes.

While the inspectors are on site, have them also look over the polar crane to see if all those things implied to have been corrected (in the September meeting) when a high level

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manager got involved, really got fixed. No fair trying to scare them about radiation, either.

Cart Before the Horse

I don't know how three revisions to the Restart Action Plan could be issued before doing ALL the necessary management (non-technical) root causes. For example, where is the QA root cause? Where is the operations root cause? Where is the corporate review committee root cause? Has it already been decided that they will yield no significant information?

This is my eleventh letter. It needs no reply.

Thank you.

A handwritten signature in cursive script that reads "Tom Gurdziel".

Tom Gurdziel

Copy: D. Lochbaum