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Oswego, NY 13126
October 30, 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:

IAEA

Although I have seen comments that the Davis-Besse nuclear operating organization should have made use of the operating experience of others, I have not noticed any related comment for the US NRC. In particular, (although I do not have them), I would think that the following advice would be worth a look, based on the titles alone:

“Quality Assurance for Safety in Nuclear Power Plants and other Nuclear Installations: Code and Safety Guides Q1-Q14”, Safety Series No. 50-C/SG-Q, 2001

“Inspection and Enforcement by the Regulatory Body for Nuclear Power Plants: A Safety Guide”, Safety Series No. 50-SG-G4 (Rev 1), 1996

“Periodic Safety Review of Operational Nuclear Power Plants: A Safety Guide”, Safety Series No. 50-SG-O12, 1994

“Management of Nuclear Power Plants for Safe Operation”, Safety Series No. 50-SG-09, 1984

These publications are listed by the International Atomic Energy Agency.

Audit Of US NRC Activities

In previous correspondence, I have pointed out my view that no viable QA activities exist at FENOC operated Davis-Besse. It is also my opinion that no viable QA has been done of the US NRC commercial plant inspection and enforcement efforts. Wouldn't this be the specific responsibility of the Office of the Inspector General?

Absence of Quality Control

The last time I counted, I had read at least 950 pages about Davis Besse (almost all provided on your web page), without a single reference to Quality Control. How could

this be? Did no NEI visitor ever say: "Where is your QC?", Did no INPO team member ever say: "How can you exist in a regulated environment without QC?", Did no State Public Service Commission type person ask? Did no NRC person notice? Did no Inspector General person see? Did no FENOC corporate person ask? Did no outside safety review committee consultant see? How about new hires from other nuclear operating company plants? How about transfers from other FENOC plant sites? Or, how about those members of the site Quality "Assessment" organization? Is there no requirement in their FSAR?

It doesn't matter what the NRC did or didn't do IF Davis-Besse/FENOC was doing what they were supposed to do. They didn't.

Davis Besse Communication Practices

I have been in the mid west a few times without noticing communication problems. For example, I probably wouldn't have passed the simulator part of my (non hobby) SRO at Morris, IL with such trouble. I have found the Davis-Besse dialect hard to follow, but I believe that I have identified some rules that are followed.

Rule 1 Never say anything bad; just say the favorable

Example: Say we cleaned the head but don't say what part. (This implies that the entire head was cleaned.)

Rule 2 Take credit for more than you are doing

Example: Say we are increasing the sump when you are only increasing the area of the sump strainer.

Rule 3 Provide Minimal Information

Example: When asked what criteria was used to size the enlarged containment sump strainer, the full answer was approximately "bigger is better, and was at Perry, too."

Rule 4 Redefine mathematics in your favor

Example: Say it is not 1/8 of an inch, it is .125. (This implies that the stainless steel was actually thicker than 1/8 of an inch while in other parts of the country, both the fraction and the decimal are considered equivalent.)

Rule 5 Don't listen to criticism

Example: After being criticized in general for not taking timely corrective action, ignore the criticism and spend 7 months on the polar cane without completely refurbishing it.

Rule 6 Report Selectively

Example: When the lab finds cracks in the thin stainless steel piece, announce that inside of one day; when unexpected metal deposits are found on the bottom head nozzles, wait 3 months without reporting their source.

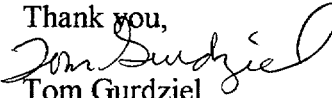
Rule 7 Use Established Acronyms

Example: If the NRC uses "ROP" for "Reactor Oversight Process", you should use it for something else, like "Restart Oversight Process" or "Restart Oversight Program". (This allows you to demonstrate cleverness and cause confusion, all at the same time.)

Example: "ISEG", where the "SE" does NOT mean "Safety Evaluation"

Example: "QA", where the "A" does NOT mean "Assurance".

This is my twelfth letter. It needs no reply.

Thank you,

Tom Gurdziel

Copy: D. Lochbaum