9 Twin Orchard Drive
Oswego, NY 13126
November 21, 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 am discouraged. It appears to me that nothing important has changed at Davis-Besse. Didn't I read that the problem was an emphasis on production over safety and that this was accomplished by mostly addressing symptoms? Well, I am looking at slide 20 of 53 from the November meeting.

Deposits on the bottom nozzles, which after 3 months and either 2 labs or 2 series of tests cannot be identified as upper head deposits, tell me that they came from the lower head area. Now we are not talking simply about an "indication" of a possible flaw. We are talking about actual through wall cracks or, perhaps, through weld cracks that borated water passes through. This is a violation of their existing Technical Specifications, which, I recall reading somewhere, prohibits any primary coolant system leakage.

I don't know where these holes are, but I would suspect they are not where the slide shows the existing incore nozzles would be removed. Failure there would probably first require the flow of borated water through the cladding and 4 of the 5 inches of steel in the lower head. Even for Davis-Besse, this seems unlikely.

So, I suspect the leaks are somewhere above. To me this means that the symptom: lower nozzle deposits, is being addressed and the cause is being ignored. Isn't this another demonstration of an emphasis on production over safety?

Please note that any borated water leakage between the outer surface of the remaining and/or new nozzle and the hole through the lower head (provided for that nozzle), will not drain, but will probably act like it did on the upper head where it was pooled at a lower temperature appropriate for aggressive metal attack.

Additionally, let me state that I expect that the leakage I mentioned above to occur only during faster cooldowns when the lower head (and the rest of the reactor vessel) doesn't cool as fast as the (lower) nozzle parts.

Finally:

I still haven't seen the full transcript of the October meeting

I still haven't seen the part of the Management Root Cause promised by FENOC to be done on Operations.

I still haven't seen the part of the Management Root Cause promised by FENOC to be done on Corporate QA.

I still haven't seen the part of the Management Root Cause promised by FENOC to be done on Site QA.

This is my fourteenth letter. It needs no reply.

Thank you,

Tom Gurdziel

Copy: D. Lochbaum