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Oswego, NY 13126
December 7, 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 have just read a Regulatory Commitment Change Summary Report for Davis-Besse. It is ML023260058 in ADAMS. I have comments on a number of them.

Commitment O08625 required that a list of qualified design reviewers be maintained. Since it is "not administratively necessary," it is not to be done anymore. I think it is necessary.

Commitment O12223 appears to state that avoiding a radiation dose is more important than doing a proper job. Additionally it uses the production oriented philosophy that the plant must always be kept running: actually, the failed transmitter could be fixed when not "at power" if the plant would be shut down for the repair. Or, perhaps a redundant pressure transmitter could also be installed. Otherwise it seems they are using an operator work-around, which I thought they said they would not do.

Commitment O15277 confuses changing diesel engine oil with sampling the oil. Replacing the oil every 12 months will not provide early warning of problems, but sampling might. (This shows a lack of understanding of predictive maintenance.)

Commitment O15555 (for both Decay Heat Cooler and CCW Heat Exchanger) ignores the possibility that performance may deteriorate with age. This is a production oriented change.

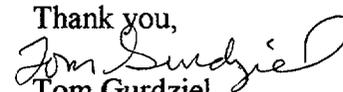
Commitment O15921 appears to be a throwback to maintenance before the 1980s, if I understand it correctly.

Commitment O17419 seems to confuse valve exercising with IST valve testing. Also, couldn't testing it in the (ten year long) second interval be easily deferred to the next interval, and then the next?

Commitment O05641 shows that low radiation dose is more important than doing the job properly. This is production oriented.

Since the cover letter was dated November 18, 2002, I had expected to see less production oriented reasons.

This is my sixteenth letter. It needs no reply.

Thank you,

Tom Gurdziel

Copy: D. Lochbaum