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Lipa

9 Twin Orchard Drive
Oswego, NY 13126
February 16, 2003

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:

First, please have this theory proven wrong (by the plant operator).

Theory: Each trail of leakage on the side of the reactor vessel is the result of a failure of the reactor upper head flange to reactor vessel flange gaskets at different times during previous runs. This was made more likely by a maintenance practice of reusing, not replacing, both gaskets each time the reactor upper head was installed.

I would expect part of the proof would be paid receipts for these replacement O rings, (I don't know how better to describe them), shipping papers, and receipt inspection reports by the on site quality control department to show that the gaskets were actually received on site. It would be nice if some documented inspection was done of the flanges before the new gaskets were installed. In any case, the old ones had to be shipped out; papers for this should also exist, as well as work control instructions/procedures and dose estimates.

If it turns out that they did reuse their O ring gaskets, I suggest checking all other FENOC run reactors for the same practice, and possibly the same results(s). Also, review any documented observations of this practice by any industry assist organization during the applicable time period.

Second, could I point out that it is misleading in public meetings to claim all those imported replacement managers have SROs? I don't have a Senior Reactor Operator (SRO) license: I used to have one on another plant. So do these people. If their license was on another PWR, then I would consider it more valuable, but some could be on BWRs (as mine was).

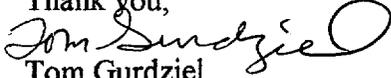
In contrast, I believe the most senior site management person at two nuclear plants in my town obtained SRO certification on BOTH plants. You can rightly conclude that he has a large amount of plant specific knowledge.

Third, why would you not do a vessel hydro when leaks are suspected? Doesn't this plant have a viable non-production oriented In Service Inspection (ISI) program? And, please note, I am talking about the extensive hydro done to satisfy periodic ISI program requirements, not the more simple one we used to do every time we started up after reassembling the reactor vessel.

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Fourth, I might expect the replacement upper head flange surface to be flat within acceptable limits since it has seen no service. I do not think that such an assumption should be made for the existing top flange surface of the reactor vessel.

Please note that I have not yet read the January public meeting transcript, in which these ideas may have been covered. This is letter twenty. It needs no reply.

Thank you,

Tom Gurdziel

Copy: D. Lochbaum