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FROM:

Barry Quigley

DOC DT: 05/19/03

NRR RCVD DATE: 05/29/03

TO:

Sam Collins

FOR SIGNATURE OF :

** YEL **

DESC:

Misleading Information in FENOC's 2.206 Petition
Rebuttal of April 11, 2003

ROUTING:

Collins
Borchardt
Sheron
Case
NRR Mailroom

ASSIGNED TO:

DLPM

CONTACT:

Zwolinski

SPECIAL INSTRUCTIONS OR REMARKS:

May 19, 2003

Mr. Samuel J. Collins, Director
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Misleading Information in FENOC's 2.206 Petition Rebuttal of April 11th, 2003

Dear Mr. Collins:

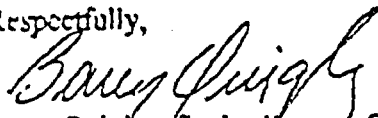
FENOC's April 11th, 2003 rebuttal is misleading regarding the operability of the reactor coolant leak detection system. The charade starts with FENOC's statement that "the containment radiation monitors are capable of detecting a 1 gallon per minute leak with 0.1% failed fuel". As I have previously pointed out to NRC¹, the current reactor coolant activity levels at all PWRs are far too low for the containment atmosphere monitors to be able to detect leakage.

Apparently FENOC does not learn from the past; this omission is in the same vein as the famous missing photo of the reactor head boric acid encrustation that was not provided to NRC. However, if NRC absolves FENOC based on the utility's lack of knowledge of the issue, then the burden rests solely with NRC for dragging their feet since 1996 on the inability of radiation monitors to detect leakage with no failed fuel. To date, NRC has issued no generic communication to licensees to notify them of this deficiency.

FENOC then points to the containment sump level and flow monitoring system as a complementary component of the overall leak detection scheme. The complementary nature is only true if the radiation monitors are operable; if not, then the overall system lacks the diversity of Regulatory Guide 1.45.

I request NRC perform a detailed as-found review of Davis-Besse's compliance with General Design Criterion 30, 'Quality of reactor coolant pressure boundary'. This review should verify, at a minimum that Davis-Besse's containment radiation monitors can detect 1 gpm within 1 hour with reactor coolant activity levels that exist or are likely to exist in the possible next operating cycle.

Respectfully,



Barry Quigley, Senior Reactor Operator
qqif@aol.com
3512 Louisiana Rd
Rockford, IL 61108
815-397-3392

¹ May 17th, 2002 letter Quigley to Travers, Accession ML021420365