

March 16, 2004

MEMORANDUM TO: Davis-Besse Oversight Panel

FROM: John A. Grobe, Chairman, Davis-Besse Oversight Panel */RA/*

SUBJECT: REVISED OCTOBER 9, 2003 MINUTES OF INTERNAL MEETING OF THE DAVIS-BESSE OVERSIGHT PANEL (Revised RAM Closure Attachment)

The implementation of the IMC 0350 process for the Davis-Besse Nuclear Power Station was announced on April 29, 2002. An internal panel meeting was held on October 9, 2003. Attached for your information are the minutes from the internal meeting of the Davis-Besse Oversight Panel and the "Open" Action Items List.

Attachments: As stated

cc w/att: H. Nieh, OEDO  
J. Caldwell, RIII  
G. Grant, RIII  
S. Reynolds, DRP  
R. Gardner, DRS  
B. Clayton, EICS  
G. Wright, DRP  
DB0350

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OFFICE	RIII	RIII	RIII
NAME	RBaker	CLipa	JGrobe
DATE	03/11/04	03/15/04	03/16/04

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MEETING MINUTES: Internal IMC 0350 Oversight Panel Meeting  
Davis-Besse Nuclear Power Station

DATE: October 9, 2003

TIME: 11:30 a.m. Central

ATTENDEES:

D. Passehl	J. Hopkins	B. Ruland
C. Lipa	J. Stang	M. Phillips
J. Jacobson	M. Salter-Williams	
J. Rutkowski		

Agenda Items:

1. Discuss/Approve Today's Agenda

The Panel approved the agenda, but modified the order of presentations. **THE APPROVED AGENDA REFLECTS THE ORDER LISTED IN THESE MINUTES.**

2. Discuss Restart Checklist Item 3.c, "Quality Audits and Self-Assessments of Programs"

Mr. Jacobson led a discussion of Restart Checklist Item 3.c, "Quality Audits and Self-Assessments of Programs." The results of the NRC's evaluation of Quality Audits was documented in the Programs Inspection Reports 50-346/02-11 and /03-09. The licensee has several procedures in place that should assure that adequate self-assessments are performed in the future. These include a focused self-assessment guideline procedure, a program assessment ownership and development procedure, and a self-assessment procedure for licensee management to select specific programs for self-assessments. The inspection of the licensee's review of Self-Assessments of Programs was performed by Mr. Jacobson and will be documented in Inspection Report 50-346/03-23. **THE PANEL APPROVED CLOSURE OF RESTART CHECKLIST ITEM 3.C, "QUALITY AUDITS AND SELF-ASSESSMENTS OF PROGRAMS."**

3. Discuss Status of Reactor Vessel Inspections

Mr. Jacobson led a discussion of the status of the reactor vessel inspections. The licensee completed its inspections of the reactor vessel bottom head incore monitoring instrumentation nozzles and identified no evidence of leaks. The licensee is in the process of inspecting the reactor vessel upper head control rod drive mechanism penetration flanges. The first step of the upper head inspection involves visually examining the control rod drive mechanism mechanical joints/flanges. That inspection is in process. The licensee has found indications and is working to characterize the indications.

4. Discuss Restart Action Matrix Closure Forms

Mr. Phillips led a discussion of Restart Action Matrix Closure Forms. The Panel approved closure of several RAM Items. **THE RESTART ACTION MATRIX ITEMS THAT THE PANEL APPROVED FOR CLOSURE ARE ATTACHED TO THESE MINUTES.**

5. Discuss October 6, 2003, email from P. Blanch regarding safety rod withdrawal during Normal Operating Pressure test

Mr. Phillips led a discussion on an October 6, 2003, email from P. Blanch regarding safety rod withdrawal during Normal Operating Pressure test. The email questioned the appropriateness of withdrawing safety rods during the test. The Panel determined that this issue should be addressed by the resident inspectors and documented in an inspection report. Mr. Hopkins stated that withdrawal of the safety group was also discussed in the licensee's May 14, 2003, License Amendment Application (ADAMS Accession No. ML031360407).

**NEW ACTION ITEM (217)** - Scott Thomas to review and document the acceptability of the licensee's withdrawal of the single safety group of control rods to provide a prompt trip response source of negative reactivity. The review will be documented in a resident inspection report.

6. Discuss New Allegations and Determine Whether Any Are Required to Be Resolved Prior to Restart

Mr. Phillips informed the Panel that there were no new allegations.

7. Discuss Any Allegations for Which an Extension Was Requested

Mr. Phillips informed the Panel that there were no allegations for which an extension was requested.

8. Discuss Communication Status

Mrs. Lipa informed the Panel that there was a 2 p.m. telephone conference today among communication team members to disposition items.

9. Discuss 1000's of Letters

Mrs. Lipa led a discussion of the 1000's of Letters project. New letters from yesterday's Public Meeting have been received in the Division of Resource Management and Administration (DRMA). Mr. Ruland suggested that Mr. Mendiola work with Mrs. Lipa to get problems with the project resolved.

10. Discuss Time Line for 10 CFR 2.206 Petition

Mr. Hopkins led a discussion on the time line for the 10 CFR 2.206 Petition submitted on August 25, 2003, (Accession No. ML032400435) by Greenpeace, on behalf of NIRS and UCS. This petition requests the NRC take enforcement actions against FENOC, suspend the Davis-Besse plant license, and preclude plant restart until certain conditions have been met. Mr. Hopkins stated that an acknowledgment letter was sent

two days ago (Accession No. ML032690314). Mr. Hopkins also stated that FirstEnergy Nuclear Operating Company plans to reply on October 17, 2003. The NRC intends to issue a partial final decision on immediate actions requested and then in 120 days or so issue a proposed Directors Decision.

11. Discuss Date for Restart Readiness Assessment Team Inspection to Identify Staff

Mr. Passehl led a discussion on the date for staff to be identified for the Restart Readiness Assessment Team Inspection. Mr. Ruland stated that the team should be identified soon recognizing that team members may be replaced due to other commitments and the licensee's changing schedule. Mrs. Lipa commented that portions of the inspection that could be done in the near term should be considered. Mr. Passehl took action to review the inspection plan for items that could be inspected sooner rather than later and to work with Regional Technical Support personnel to start staffing inspection.

12. Discuss HPI Modification TIA and Evaluation Approach

Mr. Hopkins led a discussion on the high pressure injection pump modification Task Interface Agreement and evaluation approach. Mr. Hopkins commented that the TIA as written may not be what the Region III staff wants. The Panel approved an extension of the due date to October 31, 2003.

**NEW ACTION ITEM (218)** - Christine Lipa took action to set up a meeting to discuss the HPI Pump TIA and ensure that the TIA as-written reflects the needs of Region III personnel.

13. Discuss New/Potential Licensing Issues

Mrs. Lipa discussed a letter dated October 3, 2003, from FirstEnergy Nuclear Operating Company, "Correction of Information Provided in 10 CFR 50.55a Relief Requests Regarding American Society of Mechanical Engineers Boiler and Pressure Vessel Code Inservice Inspection Program at the Davis-Besse Nuclear Power Station, Unit 1" (ML032810388). Mr. Passehl commented that this letter should be evaluated as part of the Completeness and Accuracy Inspection. Mrs. Lipa also discussed other licensing issues, including a supplement to the NRC's 10 CFR 50.54f letter and a licensee commitment mentioned in Licensee Event Report 2003-07.

14. Discuss Plans to Address TI 2515/153, "Reactor Containment Sump Blockage (NRC Bulletin 2003-01)"

Mr. Hopkins commented on the NRC plans to address TI 2515/153, "Reactor Containment Sump Blockage (NRC Bulletin 2003-01)." Mr. Hopkins stated that the licensee response to the Bulletin had been received and that NRC's reply has been drafted and is being routed for concurrence. The Panel was not ready to discuss the plans to address TI 2515/153.

15. Discuss/Update Milestones and Commitments

The Panel reviewed and discussed upcoming milestones and commitments.

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

Item Number	Action Item (Date generated)	Assigned to	Comments
73	Send feedback form on IMC 0350 procedure to IIPB (8/6)	Lipa/ Mendiola	8/6 - Generate feedback after panel meetings reduced to once per week; 8/29 - Discussed - no change; 10/1 - Discussed; 11/7 - D Passehl sent email to C Carpenter and D Coe indicating that we would be able to perform a review of the draft IMC 0350 during the first quarter of 2003; 12/3-discussed; 01/03 - 2 parts, short part- C. Lipa with P. Harris, long part- B. Dean; 01/07 - 2 <sup>nd</sup> larger response will require meeting between all parties; 01/21 - Communications with P. Harris; 01/31-Meeting with P. Harris on Feb 4; 02/11 - Many concerns identified by the panel for inclusion; 02/21 - July 1 due date for larger input; 07/01 - Request two month extension of due date; 07/22 - Due date extended to September 1; 09/25- Due date extended to January 1.
138	Evaluate the effectiveness of the Comm Plan (01/07)	A. Mendiola, C. Lipa	01/31 - Ongoing; 02/21 - New EDO Comm Plan for Crisis Update, A. Mendiola to review for inclusion.
147	Generate a list of items to consider after restart as well as transition back to the normal 0350 when terminating the 0350 Panel. The items should include plans to augment inspection of corrective actions, inservice inspection, and safety culture monitoring. (01/09)	D. Passehl	01/31 - working; 02/11 - Include dates and deadlines to Manual Chapter 0350 restart inspections planner; 07/01 - Discussed; 7/22 - Dave has list with Christine's comments; 08/05 - Discussed. Bring back 6 weeks; 09/23 - Discussed; 09/30 - The Panel decision is to separate this into three distinct listings: Inspection Schedule items for both prior to and following restart; Focus Areas for post restart; and 0350 Panel termination criteria. The Panel will approve listings.

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

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178	Determine the type of backlog assessment that will be performed and by whom. Two attributes need to be considered: (1) the capability of the licensee to manage the backlog in an operating environment; and (2) the impact of the backlog on equipment reliability. (03/04)	C. Lipa	09/23 - S. Burgess was named to lead this inspection; 09/30 - Discussed, reevaluation of resources and decision on who will lead this inspection will be done on 10/2.
189	Collect Information on the Regulatory Approach to Research the Process to Ensure Proper Regulatory Footprint upon Restart (05/16)	J. Stang	05/27-Discussed; 07/01 - The Millstone Order was reviewed and the approach is not appropriate. Bill also look at the South Texas approach; 07/15 -Discussed, title changed; 7/22 - Lead changed; 09/30 - Discussed, history table populated with past 0350 decisions will be presented and decision on this criteria will be made by 10/9.
193	Consider TIA on an issue pertaining to 10 CFR 50 Appendix R Section III-L, "Alternative and Dedicated Shutdown Capability." (05/27)	J. Stang	A concern was identified for the shutdown function performance goal of maintaining reactor coolant level. An NRC safety evaluation report issued in 1991 apparently allows the licensee to maintain reactor coolant level above the top of active fuel instead of maintaining level within the range of indication in the pressurizer; 7/1 - John Hannon to determine if a TIA is necessary or the issue is moot. Sent in draft TIA to HQ's J. Stang to review licensing basis first; 09/30 - Discussed, update will be presented on 10/2.

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

Item Number	Action Item (Date generated)	Assigned to	Comments
196	Determine whether the shift manager is qualified to fulfill the shift engineer position in an emergency and whether there is an adverse impact on the licensee's emergency procedure Implementation. (06/17) Item re-opened at 7/1 Panel meeting.	J. Grobe	6/24 - Closed; 7/1 - Re-opened - see meeting minutes for additional information; 09/30 - Resolution will be available by 10/3.
197	Develop a communication plan with restart Qs and As. (06/17)	J. Stang	6/24 - Lead changed; 08/21 - Lead changed; 09/30 - Discussed, list of Q & As is being gathered for review and forwarding to RA.
201	Coordinate with L. Gerke and ask her to call Rep. Kaptur's staff regarding the June 13, 2003, letter from Chairman Diaz to Kaptur. The purpose of the call would be to update Rep. Kaptur on the recent issues with the HPI Pumps and provide information on NRC actions to review LER 2003-02.(06/20)	T. Mendiola	6/24 - The Panel determined that when the communication plan is developed for the preliminary significance determination for HPI Pump issue that we consider interfaces with those people who receive the letter; 07/15 - Discussed; 08/21 - Discussed; 09/30 - Discussed, covered by GTG HPI Comm Plan, need to decide if this goes through the EDO's or Chairman's office.
202	Put a discussion of the actions the NRC took in reviewing concerns involving the reactor coolant pumps in the August 2003 newsletter. (07/15)	J. Strasma	
208	Evaluate the need to call back CI regarding Allegation RIII-2002-A-0177 (D-B) after the OI Investigation is complete (08/21)	M. Phillips	

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

Item Number	Action Item (Date generated)	Assigned to	Comments
209	Add author of Greenpeace 2.206 petition to the standard distribution list on documents for Davis-Besse. Then remove from distribution 90 days after the <b>final</b> NRC reply to the 10 CFR 2.206 Petition is signed out. (9/16)	A. Saso	
210	Contact cognizant personnel in NRC Research regarding the evaluation Research is performing about the combined effects of the deficiencies at Davis-Besse and coordinate a briefing of the Panel. (09/23)	J. Hopkins	
211	(a) Issue a status report of the NOP test results thus far; (b) Issue a status report after the NOP inspection of record has been completed; (c) Issue a status report after the upper reactor vessel head and lower reactor vessel head tests are completed. The reports are to be forwarded to NRC Division of Engineering personnel. (09/23)	J. Jacobson	10/09-Discussed; Mr. Jacobson provided the Panel with an update on the licensee's progress to date. Draft status reports are pending.

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212	Determine whether the Communication Team has received all electronic and written correspondence from external sources. If there is reasonable confidence that the Communication Team has all the correspondence then develop a set of bullets explaining why there is reasonable confidence. (09/23)	J. Stang	
213	Update the punch list that will be used to ensure that NRC activities necessary for restart are accomplished with intermediate steps and their due dates. (09/25)	C. Lipa	
214	Discuss with Region III Public Affairs Officers whether to include a discussion of the September 20, 2003, rally sponsored by the Union of Concerned Scientists in the next monthly NRC newsletter. (09/25)	C. Lipa	

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

Item Number	Action Item (Date generated)	Assigned to	Comments
215	Contact the Congressional Affairs office to obtain a current listing of Q & A's on matters pertaining to restart and coordinate with Mr. Mendiola to provide an updated package to the Panel for review and incorporation into the Comm Plan.	J. Stang	
216	Submit a TIA which addresses issues and questions related to the licensee's 1991 10 CFR Appendix R exemption request regarding Alternative Shutdown (ASD) regulations.	J. Lara	
217	Review and document the acceptability of the licensee's withdrawal of the single safety group of control rods to provide a prompt trip response source of negative reactivity. The review will be documented in a resident inspection report.	S. Thomas	
218	Set up a meeting to discuss the HPI Pump TIA and ensure that the TIA as-written reflects the needs of Region III personnel.	C. Lipa	

**APPROVED RAM CLOSURES FROM 10/9/03 PANEL MEETING**

**RAM Item No.** - E-31

**Closed:** Y

**Date of E-Mail** - 02/26/03 at 2:00 pm

**Author** - Blanch

**Description of Issue** - Jack to provide answer to Paul Blanch: "Please review the enclosed photo that was taken sometime in March 1993. From this photo, it appears that a nozzle was leaking at that time. The reddish brown deposits do not originate from flange leakage. Are we missing something?"

**Restart Checklist Item:** N/A

**Description of Resolution** - John Jacobson and Christine Lipa called Mr. Blanch on August 1, 2003, and discussed the issue. Mr. Blanch stated that he was satisfied with our response at that time. This item is closed.

**Reference Material** - None.

**RAM Item No.** - L-90

**Closed:** Y

**Date of Letter** - 02/10/03

**Author** - Lochbaum

**Description of Issue** - Did FENOC properly evaluate problems raised during the system assessments at D-B for reportability under 10 CFR 50.72 and 50.73? In a letter dated February 10, 2003, the Union of Concerned Scientists questioned whether the licensee was properly evaluating the reportability of issues identified during the system reviews. This was based on a subjective comparison to the number of LERs issued under similar review programs conducted at plants such as Cook and Millstone.

**Restart Checklist Item:** 2.all

**Description of Resolution** - The inspectors reviewed the corrective actions and considered them adequate and appropriate to the circumstances. All restart-related corrective actions were verified to be complete including submission of LERs and LER supplements. The inspectors examined the licensee's operability/reportability status on a periodic basis to ensure that significant issues were being properly evaluated for reportability on an ongoing basis. Since CR 02-09413 was issued, the licensee had issued 9 initial LERs and one supplement. The inspectors also assessed operability/reportability for a number of CRs, classified as a condition adverse to quality, being reviewed for corrective actions as part of this inspection. No discrepancies were identified. Based on the acceptability of the basic cause, the corrective actions, the extent of condition evaluation, and inspector reviews of additional condition reports, the inspectors concluded that the licensee is properly evaluating issues for operability and reportability.

**Reference Material** - Condition Report (CR) 02-09314, "Untimely Determination of Reportability" and NRC Inspection Report Number 50-346/02-17, dated December 9, 2002.

**RAM Item No.** - C-02

**Closed:** Y

**Description of Issue** - Concerns with EDGs capability to start and carry sequenced and steady state loads.

**Description of Resolution** - The cause analysis report identified and evaluated all concerns in sufficient detail. All technical concerns were addressed by appropriate licensee corrective actions (CAs 6, 7, 9, 13, 14, 15, 16, and 19 to Condition Reports 02-08482 and 02-05385). The inspectors concluded that the CR process was satisfactory in capturing and bringing to resolution all concerns related to EDG loading.

**Reference Material** - CR 02-08482, CR 02-05385, and Calculation C-EE-0241.01-006, Rev. 0

**RAM Item No.** - C-18

**Closed:** Y

**Description of Issue** - Reduce Pressurizer high level limit from 305 to 228 inches. The licensee had been operating with an administrative control of 228 inches. This is an open licensing action. Need to inspect the licensee's operating procedures to see that the licensee has appropriately captured the administrative control.

**Description of Resolution** - License amendment No. 225 was issued on August 12, 2003, closing out this action. The licensee's procedures contained the old administrative limit of 228 inches before this same limit was imposed by the amended TS.

**Reference Material** - ADAMS Accession No. ml031681426.

**RAM Item No.** - C-21

**Closed:** Y

**Description of Issue** - How will the licensee consider the containment radiation monitors operable? (LLTF Issue)

**Description of Resolution** - The monitors will be considered operable if they pass the surveillance tests specified in Technical Specification 4.3.3.1, "Radiation Monitoring Instrumentation Surveillance Requirements." The TS specifies a shiftly channel check; monthly channel functional test, and a channel calibration every 18 months. Of note, these monitors were never inoperable during the last operating cycle except during the associated surveillance tests. Even while rust built up on the particulate filters, the filters were never allowed to accumulate sufficient rust to result in the monitor being inoperable. Filter change outs were scheduled, sometimes as often as daily, to ensure that the cartridges were not overly clogged and the monitor remained operable.

**Reference Material** - Licensee Technical Specification 4.3.3.1 and RAM Closure forms associated with the May 27, 2003, Panel Meeting.

**RAM Item No.** - C-24

**Closed:** Y

**Description of Issue** - Both Order and Bulletin 2002-01 Boric Acid Corrosion program response to be tracked as RAM items.

**Description of Resolution** - The licensee responded to the associated Order by letter dated March 1, 2003. The licensee committed to the Order requirements and did not request any exceptions or relaxations. With regard to Bulletin 2002-01, the NRC, in a letter dated June 25, 2003, concluded that the licensee provided an acceptable 15-day response (item 1 of the bulletin). Consistent with the NRC review of the Bulletin responses for the other plants, NRC Bulletin 2002-01 items 2 and 3 remain open for Davis-Besse. Item 2 concerns future inspections and does not need to be closed for restart because the licensee has committed to the requirements of the Order for inspections. Item 3 concerns compliance with GL 88-05, which is addressed by Restart Checklist item 3.d, "Boric Acid Corrosion Control Program Acceptability," which effectively tracks this item.

**RAM Item No.** - C-28

**Closed:** Y

**Description of Issue** - Need to ensure unqualified containment coatings (mostly on conduit) are evaluated to ensure they will not lead to any sump blockage.

**Description of Resolution** - This item is duplicative of Restart Checklist Item 2.c.1, "Containment Sump." The issue is addressed in detail and closed in NRC Inspection Report Number 50-346/03-17.

**Reference Material** - NRC Inspection Report No. 50-346/03-17 (ADAMS Accession No. ml032721592).

**RAM Item No.** - C-33

**Closed:** Y

**Description of Issue** - Evaluate the licensee's radiation protection management stability given the turnover in radiation protection managers, allegations and employment discrimination cases since February 2002.

**Description of Resolution** - Discussions with a cross section of radiation protection personnel including technicians, supervisors, health physics staff and managers indicated that radiation protection management had improved, that personnel issues had been or were being resolved, and that the radiation protection organization had a positive attitude. This attitude change was felt to be the result of program ownership by individuals and team building. The inspectors concluded that management stability in the radiation protection organization was not an issue and that the radiation protection organization was capable of supporting plant restart.

**Reference Material** - NRC Inspection Report No. 50-346/03-017 (ADAMS Accession No. ml032721592).

**RAM Item No.** - CAL-02

**Closed:** Y

**Description of Issue** - Determine the root cause of the degradation around the RPV head penetrations, and promptly meet with the NRC to discuss this information after you have reasonable confidence in your determination.

**Description of Resolution** - This CAL item was closed by update letter E issued to the licensee on September 19, 2003.

**Reference Material** - Confirmatory Action Letter Update E dated September 19, 2003 (ADAMS Accession No. ml032650662).

**RAM Item No.** - SUP-01

**Closed:** Y

**Description of Issue** - Problem Identification: Determine that the evaluation documents how long the issue existed, and prior opportunities for identification.

**Description of Resolution** - By letter dated April 18, 2002, FirstEnergy Nuclear Operating Company (FENOC) submitted its Root Cause Analysis Report of the reactor pressure vessel (RPV) head degradation in accordance with the Confirmatory Action Letter dated March 13, 2002. On May 7, 2002, the Nuclear Regulatory Commission (NRC) staff held a public meeting with FENOC representatives to discuss the technical aspects of the root cause analysis. Revision 1 of the Report was submitted by letter dated September 23, 2002. The Davis-Besse Root Cause Analysis Report provided a broad scope assessment of the "root cause," covering various programmatic, implementation and managerial issues, along with a description of the technical sequence of events from the initiation of cracking in the control rod drive mechanism (CRDM) nozzles to the formation of the cavity identified in March 2002. The NRC staff reviewed the report and based on the information currently available, the NRC staff concludes that the licensee's analysis presents a plausible scenario of the degradation at Davis-Besse. In the absence of direct physical evidence, the basis for the staff's conclusion is experience with past boric acid corrosion events and the extension of that knowledge to the extreme Davis-Besse case. Uncertainties with regard to the technical details of the RPV head degradation (including the sequence, rate and nature of the mechanisms that resulted in the degradation) preclude a definitive conclusion to the technical Root Cause Analysis Report. However, the level of understanding of the root cause is sufficient for this licensee to proceed with use of the replacement head from the canceled Midland plant.

In addition to the technical root cause reviews, the licensee also conducted seven individual assessments in the Management & Human Performance area as follows:

1. "Root Cause Analysis, Failure to Identify Significant Degradation to the Reactor Pressure Vessel Head," dated August 13, 2002;

2. "Root Cause Analysis, Failure in Quality Assurance Oversight to Prevent Significant Degradation of the Reactor Vessel Head," dated September 10, 2002;
3. "Root Cause Analysis, Lack of Operations Centrality in Maintaining, Assuring, and Communicating the Operational Safety Focus of Davis-Besse and Lack of Accountability of Other Groups to Operations in Fulfilling that Role," dated November 22, 2002;
4. "Root Cause Analysis, Assessment of Engineering Capabilities," dated January 3, 2003;
5. "Evaluation of FENOC Company Nuclear Safety Review Board," dated August 13, 2002;
6. "Evaluation of Corporate Management Issues," dated December 18, 2002; and
7. "Collective Significance Review of the Causal Factors Associated with the Reactor Pressure Vessel Head Degradation at Davis-Besse," dated March 17, 2003.

These reports were reviewed as part of the NRC's Management and Human Performance special inspections, and the results of those reviews are documented in Inspection Reports 50-346/02-15 and 50-346/02-18 dated February 6, 2003, and July 24, 2003, respectively. As stated in the July 24, 2003, letter to FENOC, the overall assessment was of appropriate depth and breadth to develop actions to correct and prevent recurrence of the management and human performance deficiencies associated with the reactor head degradation.

**Reference Material** - Confirmatory Action Letter Update E dated September 19, 2003 (ADAMS Accession No. ml032650662); NRC Inspection Report 50-346/02-15 (ADAMS Accession No. 030380037); NRC Inspection Report No. 50-346/02-18 (ADAMS Accession No. ml 032050528) and NRC Inspection Report No. 50-346/03-04 (ADAMS Accession No. ml 031320705).

**RAM Item No.** - SUP-02

**Closed:** Y

**Description of Issue** - Problem Identification: Determine that the evaluation documents how long the issue existed, and prior opportunities for identification.

**Description of Resolution:** See closure information for SUP-01 above.

**Reference Material** - None.

**RAM Item No.** - SUP-04

**Closed:** Y

**Description of Issue** - Root Cause and Extent of Condition Evaluation: Determine that the problem was evaluated using a systematic method(s) to identify root cause(s) and contributing cause(s).

**Description of Resolution:** See closure information for SUP-01 above.

**Reference Material** - None.

**RAM Item No.** - SUP-05

**Closed:** Y

**Description of Issue** - Root Cause and Extent of Condition Evaluation: Determine that the root cause evaluation was conducted to a level of detail commensurate with the significance of the problem.

**Description of Resolution:** See closure information for SUP-01 above.

**Reference Material** - None.

**RAM Item No.** - SUP-06

**Closed:** Y

**Description of Issue** - Root Cause and Extent of Condition Evaluation: Determine that the root cause evaluation included a consideration of prior occurrences of the problem and knowledge of prior operating experience.

**Description of Resolution:** See closure information for SUP-01 above.

**Reference Material** - None.

**RAM Item No.** - SUP-07

**Closed:** Y

**Description of Issue** - Root Cause and Extent of Condition Evaluation: Determine that the root cause evaluation included consideration of potential common cause(s) and extent of condition of the problem.

**Description of Resolution:** See closure information for SUP-01 above.

**Reference Material** - None.

**RAM Item No.** - SUP-08

**Closed: Y**

**Description of Issue:** Corrective Actions: Determine that appropriate corrective action(s) are specified for each root/contributing cause of that there is an evaluation that no actions are necessary.

**Description of Resolution:** Phase 1 and Phase 2 of the Management & Human Performance inspection specifically looked at the root causes and associated corrective actions. The team performed a 100% sample of root and contributing causes against corrective actions and determined that each root or contributing cause had an associated corrective action. The team considers this RAM item closed

**Reference Material** - NRC Inspection Report Nos. 50-346/02-015 (ADAMS Accession No. ml030380037) and 50-346/02-018 (ADAMS Accession No. ml032050528).

**RAM Item No.** -SUP-09

**Closed: Y**

**Description of Issue:** Corrective Actions: Determine that the corrective actions have been prioritized with consideration of the risk significance and regulatory compliance.

**Description of Resolution** - Phase 1 and Phase 2 of the Management & Human Performance inspection specifically looked at the corrective actions. The team performed a 100% sample of corrective actions and determined that each had been appropriately prioritized with respect to its importance to safety. The team considers this RAM item closed

**Reference Material:** NRC Inspection Report Nos. 50-346/02-015 (ADAMS Accession No. ml030380037) and 50-346/02-018 (ADAMS Accession No. ml032050528).

**RAM Item No.** -SUP-10

**Closed: Y**

**Description of Issue:** Corrective Actions: Determine that a schedule has been established for implementing and completing the corrective actions.

**Description of Resolution:** Phase 1 and Phase 2 of the Management & Human Performance inspection specifically looked at corrective actions. The team performed a 100% sample of corrective actions and determined that each had been appropriately scheduled and were being appropriately tracked by the licensee. The team considers this RAM item closed.

**Reference Material:** NRC Inspection Report Nos. 50-346/02-015 (ADAMS Accession No. ml030380037) and 50-346/02-018 (ADAMS Accession No. ml032050528).

**RAM Item No.** - SUP-41

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Procedure Quality: Assess the effectiveness of corrective actions for deficiencies involving procedure quality.

**Description of Resolution** - Several inspections evaluated the effectiveness of corrective actions for deficiencies involving procedure quality. These included the Augmented Inspection Team Follow Up inspection, Extent of Condition Inspections Phase I and II, Effectiveness of Programs Inspection Phase I, and the Corrective Action Team Inspection (CATI). The licensee issued several condition reports regarding procedure quality or the lack of procedures where required, including CRs 02-07714, 02-09739, 02-06062, 02-06215, and 02-06064. The corrective actions were reviewed by the CATI, and determined to adequately address the deficiencies.

**Reference Material** - NRC Inspection Report No. 50-346/02-08 (ADAMS Accession No. ml022750524), NRC Inspection Report No. 50-346/02-09 (ADAMS Accession No. ml022560237), NRC Inspection Report No. 50-346/02-11 (ADAMS Accession No. ml031880844), NRC Inspection Report No. 50-346/02-12 (ADAMS Accession No. ml023370132), and NRC Inspection Report No. 50-346/03-10.

**RAM Item No.** - URI-13

**Closed:** Y

**Description of Issue** - Potential impact of corrosion on the ground function of electrical conduit in containment.

**Description of Resolution** - Condition Report 02-06788 described a condition where Boric acid corrosion of conduits in the containment could inhibit the flow of ground fault currents through the conduits (Conduits provide a supplementary grounding path for smaller motors). Further analysis, as documented in the Cause Analysis of CR 03-05239, determined that all conduits were acceptable as-is. The inspectors concurred with this conclusion.

**Reference Material** - Drawing No. E-1037P, Sheets 2 (Rev. 1), 3 (Rev. 1), 10 (Rev. 0) and 11 (Rev. 0); CR 02-06788; and CR 03-05239.