

March 22, 2004

**RAM Item No.** - E-01

**Closed:** Y

**Date of E-Mail** - 05/09/02

**Author** - Blanch

**Description of Issue** - If cracking on nozzle #3 was only axial, why did the nozzle fall over? In order to do this it had to have circumferential cracking?

**Restart Checklist Item:** N/A

**Description of Resolution** - Addressed in Mendiola letter to Blanch dated June 19, 2002. Cracking only axial, nozzle fell over due to machining of the J-weld, which caused loss of support to the nozzle. There was no circumferential cracking.

**Reference Material** - ADAMS Document Accession No. ml021560650 dated 6/19/02.

**RAM Item No.** - E-02

**Closed:** Y

**Date of E-Mail** - 05/09/02

**Author** - Blanch

**Description of Issue** - If the CRDM had not fallen over, was D-B planning to clean the head, or as in the past, restart with significant boron remaining on the vessel head?

**Restart Checklist Item:** N/A

**Description of Resolution** - Addressed in Mendiola letter to Blanch dated June 19, 2002. Licensee stated they planned to fully clean the head if the replacement head planned for 2004-2005 outage was not available by then.

**Reference Material** - ADAMS Document Accession No. ml021560650 dated 6/19/02.

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**RAM Item No.** - E-03

**Closed:** Y

**Date of E-Mail** - 05/09/02

**Author** - Blanch

**Description of Issue** - If circumferential cracking initiates from the OD to the ID, then how is it that circumferential cracking is considered PWSSC? Can I assume that the circumferential cracking is the result of axial cracking?

**Restart Checklist Item:** N/A

**Description of Resolution** - Addressed in Mendiola letter to Blanch dated June 19, 2002. The use of the term PWSSC is intended to highlight that the cause is related to primary versus secondary water. Axial cracking is not required to initiate a circumferential crack.

**Reference Material** - ADAMS Document Accession No. ml021560650 dated 6/19/02.

**RAM Item No.** - E-04

**Closed:** Y

**Date of E-Mail** - 05/09/02

**Author** - Blanch

**Description of Issue** - Is it possible that a through wall axial crack may occur and remain visually undetected due to a tight interference fit at the top of the head and then cause undetected circumferential cracking during an operating cycle?

**Restart Checklist Item:** N/A

**Description of Resolution** - Addressed in Mendiola letter to Blanch dated June 19, 2002. The answer is yes, hence the reasoning for the NRC's issuance of Bulletin 2001-01.

**Reference Material** - ADAMS Document Accession No. ml021560650 dated 6/19/02.

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**RAM Item No.** - E-05

**Closed:** Y

**Date of E-Mail** - 05/11/02

**Author** - Blanch/Corcoran

**Description of Issue** - Several places in AIT and D-B Root Cause Report state it was very hard to inspect the reactor vessel head; however, doesn't GDC 32 require access?

**Restart Checklist Item:** N/A

**Description of Resolution** - Addressed in Mendiola letter to Blanch dated June 11, 2002. The answer is D-B did not have to meet GDC 32, but they did conform to the intent of GDC 32.

**Reference Material** - ADAMS Document Accession No. ml021440118 dated 6/11/02.

**RAM Item No.** - E-06

**Closed:** Y

**Date of E-Mail** - 07/01/02

**Author** - Lochbaum

**Description of Issue** - D-B IPE submittal (1993 risk assessment) not available to public. D-B plant-specific LOOP not modeled

**Restart Checklist Item:** N/A

**Description of Resolution** - Addressed in Marsh letter to Lochbaum dated September 30, 2002. This information is being withheld as a result of the events of September 11, 2001, in accordance with COMSECY-02-0015 "Withholding Sensitive Homeland Security Information From the Public." The loss of offsite power (LOOP) event sequence is modeled as an initiating event in the general transient functional sequence (TBU). The TBU sequence is an accident sequence initiated by some type of transient (e.g., a LOOP), followed by a total loss of feedwater and failure of makeup/high pressure injection cooling.

**Reference Material** - COMSECY-02-0015 "Withholding Sensitive Homeland Security Information From the Public" is being used as guidance. ADAMS Document Accession No. ml022610666 dated September 30, 2002.

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**RAM Item No.** - E-07

**Closed:** Y

**Date of E-Mail** - 08/21/02

**Author** - Lochbaum to JAZ (NRR L-30)

**Description of Issue** - Chairman said LOCA risk is low, when in fact it was high, but the time period was short.

**Restart Checklist Item:** N/A

**Description of Resolution** - Closed based on issuance of SER to support extending operations beyond 12/31/01 till 2/16/2002. The SER discusses the risk characterization reasoning for extending the period for shutdown from 12/31/01 to 2/16/02.

**Reference Material** - December 3, 2002, letter to Lew Myers from John Zwolinski enclosing safety evaluation. In ADAMS with accession number ml023300539.

**RAM Item No.** - E-08

**Closed:** Y

**Date of E-Mail** - 08/21/02

**Author** - Lochbaum to JAZ (NRR L-31)

**Description of Issue** - Four of the five criteria (RG1.174) that licensees must satisfy for a risk-informed decision were not satisfied when the staff let D-B defer shutdown.

**Restart Checklist Item:** N/A

**Description of Resolution** - Closed based on issuance of SER to support extending operations beyond 12/31/01 till 2/16/2002. The SER discusses the reasoning used by NRC staff to defer the D-B shutdown.

**Reference Material** - December 3, 2002, letter to Lew Myers from John Zwolinski enclosing safety evaluation. In ADAMS with accession number ml023300539.

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**RAM Item No.** - E-09

**Closed:** Y

**Date of E-Mail** - 10/02/02

**Author** - Gurdziel to Lipa

**Description of Issue** - Return to Service Plan dated Aug. 21, 2002 - all the pages are presented on ADAMS. Also, nothing in the plan is a commitment to the NRC.

**Restart Checklist Item:** N/A

**Description of Resolution** - No action. Although not formally stated as commitments, the NRC's 0350 restart panel considers the items in the Return to Service Plan, as amended, to be descriptions of what actions will be taken to ensure the plant is safe for restart. As such, failure to follow the plan jeopardizes the licensee's restart approval decision.

**Reference Material** - None.

**RAM Item No.** - E-10

**Closed:** Y

**Date of E-Mail** - 11/14/02

**Author** - Gurdziel

**Description of Issue** - News article of 10/12/02 - Regards Comment on Reactor Vessel "Trailings"

**Restart Checklist Item:** 5.d

**Description of Resolution** - The licensee performed an evaluation of RPV deposits and concluded that lower head penetrations were not leaking. The NRC's Office of Nuclear Reactor Regulation reviewed the evaluation and agreed with the licensee's conclusion. In addition, the licensee performed a 7 day leak test at normal operating pressure with no leaks detected. Documentation of the NRC's review of the licensee's activities is in NRC Inspection Report No. 50-346/2003-023, which was issued on December 5, 2003.

**Reference Material** - NRC Inspection Report No. 50-346/2003-023 (ADAMS Accession No. ml033421074).

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**RAM Item No.** - E-11

**Closed:** Y

**Date of E-Mail** - 11/20/02

**Author** - Gurdziel

**Description of Issue** - Wouldn't you think that a bare metal inspection should be done at pressure and not after pressure is lowered?

**Restart Checklist Item:** 5.d

**Description of Resolution** - Boric acid in the RCS coolant leaves a recognizable deposit as demonstrated by plants such as Oconee (upper head) and South Texas Project (lower head). In the case of Davis-Besse detailed examination of the heads after the pressure test, including comparison with photos taken before the seven day pressurization were evaluated for any indication of leakage (deposit). No leakage was identified. Entering the area at pressure presents an unnecessary hazard to personnel. Documentation of the NRC's review of the licensee's activities is in NRC Inspection Report No. 50-346/2003-023, which was issued on December 5, 2003.

**Reference Material** - NRC Inspection Report No. 50-346/2003-023 (ADAMS Accession No. ml033421074).

**RAM Item No.** - E-12

**Closed:** Y

**Date of E-Mail** - 11/26/02

**Author** - Gurdziel

**Description of Issue** - It doesn't appear likely to me that the D-B operators actually do a primary coolant system visual inspection during hydro after each vessel reassembly.

**Restart Checklist Item:** N/A

**Description of Resolution** - Surveillance Test Procedure DB-PF-03010 "RCS Leakage Test" provides the guidance for performing the system leakage test as required by ASME Section XI. The NRC observed implementation of this procedure during the NOP test. Records review showed that vessel inspections per ASME Section XI, where the hydro requirements are specified, had been conducted as required. Documentation of the NRC's review of the licensee's activities is in NRC Inspection Report No. 50-346/2003-023, which was issued on December 5, 2003.

**Reference Material** - NRC Inspection Report No. 50-346/2003-023 (ADAMS Accession No. ml033421074).

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**RAM Item No.** - E-13

**Closed:** Y

**Date of E-Mail** - 11/26/02

**Author** - Gurdziel to Lipa

**Description of Issue** - Weren't we supposed to hear by the middle of November 2002 if the total loss of structural material on a reactor vessel head was "significant."

**Restart Checklist Item:** N/A

**Description of Resolution** - Preliminary issuance of "red" findings letter to the licensee dated February 25, 2003. Based on issuance of the preliminary "red" finding, this issue is closed.

**Reference Material** - ADAMS Document No. ml030560426 dated February 25, 2003.

**RAM Item No.** - E-14

**Closed:** Y

**Date of E-Mail** - 11/26/02

**Author** - Gurdziel

**Description of Issue** - The NRC should look at the condition to be expected when weld stress relieving is not used.

**Restart Checklist Item:** N/A

**Description of Resolution** - Assuming that the stress relieving refers to the modification performed on the lower head penetrations, there was no indication of leakage after the NOP, therefore there is no reason at this time to pursue details of this old modification.

**Reference Material** - None.

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**RAM Item No.** - E-15

**Closed:** Y

**Date of E-Mail** - 12/19/02

**Author** - Gurdziel to Lipa.

**Description of Issue** - What is the FENOC definition of system health? Haven't seen much initiative to fix things, just assess condition.

**Restart Checklist Item:** N/A

**Description of Resolution** - The description of system health is addressed in the System Health inspection report (IR2002-013), which was issued on February 26, 2003. Also, the licensee's building block describes this process and is publicly available via the NRC's Davis-Besse Head Degradation web page.

**Reference Material** - System Health Inspection Report 2002-013 dated February 26, 2003. In ADAMS with Accession No. ml030630314.

**RAM Item No.** - E-16

**Closed:** Y

**Date of E-Mail** - 12/19/02

**Author** - Gurdziel to Lipa

**Description of Issue** - What is the status of the containment air coolers (duct work eaten by acid, motors, heat exchangers)?

**Restart Checklist Item:** N/A

**Description of Resolution** - This item is also addressed by the closure of the containment air cooler LER 2002-008. However, the status of the coolers was evaluated during the system health inspection portion looking at the containment air cooling system. For purposes of tracking, the system health inspection report (2002-013) will be used to close this Gurdziel letter item, while the issues covering the overall return to service of operable containment air coolers will be tracked as part of follow up to LER 2002-008 and URI-03.

**Reference Material** - System Health Inspection Report 2002-013 dated February 26, 2003. In ADAMS with Accession No. ml030630314.



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**RAM Item No.** - E-17

**Closed:** Y

**Date of E-Mail** - 12/19/02

**Author** - Gurdziel to Lipa

**Description of Issue** - When painting containment, did they use rollers as well as brushes?

**Restart Checklist Item:** N/A

**Description of Resolution** - No Action. The NRC does not intend to determine which method was used, i.e. brushes or rollers. The only action will be to determine the licensee has an evaluation that shows that whatever coatings are in containment are either qualified, or if unqualified, have been analyzed to ensure that they will not affect the operability of the sump in any LOCA scenario.

**Reference Material** - None.

**RAM Item No.** - E-18

**Closed:** Y

**Date of E-Mail** - 12/19/02

**Author** - Gurdziel to Lipa

**Description of Issue** - Would the Polar crane pass inspection if inspected by the State today?

**Restart Checklist Item:** N/A

**Description of Resolution** - The Polar crane is not inspected by the State. It is a safety-related Seismic Category I structure, and as such, is under the NRC's regulatory process to ensure compliance with its design criteria. While deficiencies were identified in October 2002 related to corrective actions implemented to resolve condition reports that had been written on the crane, those deficiencies were corrected once identified. The NRC concluded that major polar crane maintenance issues were documented and resolved on condition reports. While there were failures to document polar crane maintenance items involving lighting fixtures, limit switches, and missing or loose fasteners on access panels on conditions reports, these items did not affect crane functionality.

**Reference Material** - None.

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**RAM Item No.** - E-19

**Closed:** Y

**Date of E-Mail** - 02/06/03

**Author** -Gurdziel

**Description of Issue** - Assuming they have 4 reactor coolant pumps and only fix 2, doesn't that leave 2 leaking when they start?

**Restart Checklist Item:** 2.c

**Description of Resolution** - A letter was written to Mr. Gurdziel describing the status of the reactor coolant pumps, and the details of the licensee's basis for fixing two pumps during this outage, and that none of the pumps actually showed evidence of reactor coolant leakage during operations.

**Reference Material** - Letter to Gurdziel dated December 2, 2003 (ADAMS Accession No. ml033370097).

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**RAM Item No.** - E-20

**Closed:** Y

**Date of E-Mail** - 02/06/03 at 4:27 pm

**Author** - Lochbaum

**Description of Issue** - Given the as-found condition of the sump reported by FENOC in LER 2002-005, was D-B in conformance with its design and licensing basis?

**Restart Checklist Item:** 2.c.1

**Description of Resolution** - No, the opening in the containment sump screen did not conform to the design basis. Additionally, Section 4OA3.2 of Inspection Report 03-15 discusses the as-found condition of both the sump and the containment. Based on the results of the NRC's inspection into this LER, the NRC staff concluded the issue warranted a Yellow finding and associated Notice of Violation, in that the sump may not have performed its full safety function in the event of a LOCA given the unqualified coatings in containment, and that the coatings in containment did not conform to the design and licensing basis for the containment. The Notice of Violation was issued by letter dated October 7, 2003.

**Reference Material** - Inspection Report 03-15 (ADAMS Accession No. ml032120360) and final significance determination and Notice of Violation letter dated October 7, 2003 (ADAMS Accession No. ml032801706).

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**RAM Item No.** - E-21

**Closed:** Y

**Date of E-Mail** - 02/06/03 at 4:27 pm

**Author** - Lochbaum

**Description of Issue** - Given the as-found condition of the sump reported by FENOC in LER 2002-005, would the ECCS have been able to prevent reactor core damage?

**Restart Checklist Item:** 2.c.1

**Description of Resolution** - The NRC did not review the capability of the sump given no problems with containment coatings, so we can not answer this question. However, if the as-found condition of the containment coatings are also considered, then the NRC staff concluded the issue warranted a Yellow finding and associated Notice of Violation, in that the sump may not have performed its full safety function in the event of a LOCA given the unqualified coatings in containment, and that the coatings in containment did not conform to the design and licensing basis for the containment. The details are contained in Section 4OA3.2 of Inspection Report 03-15.

**Reference Material** - Inspection Report 03-15 (ADAMS Accession No. ml032120360) and final significance determination and Notice of Violation letter dated October 7, 2003 (ADAMS Accession No. ml032801706).

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**RAM Item No.** - E-22

**Closed:** Y

**Date of E-Mail** - 02/19/03 at 8:16 am

**Author** - Blanch

**Description of Issue** - Has D-B changed its policy to require people to follow their chain of command to report safety concerns or concerns to the NRC?

**Restart Checklist Item:** N/A

**Description of Resolution** - There never was a policy that required people to follow their chain of command to report safety concerns to the NRC. Although the licensee encouraged individuals to report concerns through the chain of command, individuals were also able to directly initiate a condition report. However, the licensee has changed its policies regarding the reporting of safety concerns. The licensee has initiated several policies to make it clear that individuals are encouraged to raise issues, and that they may go through several routes to raise their concerns. Although the preferred route remains going through an individual's supervisor to get the issue addressed, there are alternate routes also available to the individual. For example, the individual may still directly initiate a condition report. Also, an individual may initiate a concern in the employee concerns program, and that concern may be raised anonymously if the employee so desires.

**Reference Material** - None.

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**RAM Item No.** - E-23

**Closed:** Y

**Date of E-Mail** - 02/24/03

**Author** - Gunter

**Description of Issue** - Did NRC's 0350 Panel review FENOC's analysis to forego inspection and testing of two of the four reactor coolant pumps to assure compliance with TS and regulatory requirements?

**Restart Checklist Item:** 2.c

**Description of Resolution** - Yes. As part of its review of Restart Checklist Item 2.c and the detailed inspections that were conducted on the reactor coolant pumps, the Panel was appraised of the status of the four reactor coolant pumps and that the licensee's actions associated with the pumps were in compliance with regulatory requirements. The details of the inspection into the reactor coolant pumps were provided directly to Mr. Gunter by letter from Mr. Grobe dated December 2, 2003. The letter is publicly available (with the address redacted) in ADAMS.

**Reference Material** - Letter to Gunter dated December 2, 2003 (ADAMS Accession No. ml033370070).

**RAM Item No.** - E-24

**Closed:** Y

**Date of E-Mail** - 02/24/03

**Author** - Gunter

**Description of Issue** - If answer to E-23 is yes, what were the NRC's findings?

**Restart Checklist Item:** 2.c

**Description of Resolution** - The findings were detailed back to Mr. Gunter in a letter from Mr. Grobe dated December 2, 2003. The letter is publicly available (with the address redacted) in ADAMS.

**Reference Material** - Letter to Gunter dated December 2, 2003 (ADAMS Accession No. ml033370070).

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**RAM Item No.** - E-25

**Closed:** Y

**Date of E-Mail** - 3/5/03

**Author** - Blanch

**Description of Issue** - Has the NRC conducted an inspection of the Davis-Besse Employee Concerns Program using Inspection Module 40001? If so, please provide a copy of the results.

**Restart Checklist Item:** 4.b

**Description of Resolution** - The NRC did not conduct an inspection of the Davis-Besse Employee Concerns Program (ECP) prior to the development, by the licensee, of corrective actions to address the deficiencies identified by the licensee's root cause evaluations into the Reactor Vessel Head degradation event. Subsequent to the event, the NRC established the Davis-Besse Oversight Panel, which developed a checklist of items that must be acceptably addressed by the licensee before the Panel will authorize Davis-Besse restart. One of these items, 4.b, addresses the effectiveness of corrective actions regarding the adequacy of the licensee's Organizational Effectiveness and Human Performance. The NRC is currently performing an inspection into this checklist item, and the inspection includes a review of the ECP put into place as a corrective action by the licensee. This inspection is looking at the licensee's ECP and utilizing parts of Module 40001 in its assessment of the licensee's program. The report is scheduled to be completed during the week of December 15, 2003, and the report number for the inspection is 03-12. Mr. Blanch will be placed on distribution to receive a copy of that report when it is issued.

**Reference Material** - NRC Inspection Report No. 50-346/03-12.

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**RAM Item No.** - E-26

**Closed:** Y

**Date of E-Mail** - 3/07/03

**Author** - Lochbaum to Grobe

**Restart Checklist Item:** N/A

**Description of Issue** - Has the NRC examined how FENOC is performing "at risk changes" to the facility? and if so, is the NRC comfortable with FENOC's at risk changes?

**Description of Resolution** - As stated in the Modifications Program review contained in Inspection Report 03-09 the inspection team concluded that the ARC [at risk change] procedure, if properly implemented has adequate controls to assure a quality modification. Regarding implementation of at risk changes, the NRC inspected the installation of the new containment sump, which was performed as an ARC. Per Inspection Report 03-06, "we concluded that the recirculation sump design modification was consistent with design and licensing basis requirements and based on field walkdowns the modification installation was adequately implemented consistent with the design." However, the same report noted that design calculations performed by vendors for the modification contained several errors that were not identified by the licensee's initial design review. This deficiency was placed into the licensee's corrective action system, and a subsequent inspection determined that the licensee's corrective actions were adequate to address the inspector's concern.

**Reference Material** - NRC Inspection Report Nos. 03-06 and 03-09.



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**RAM Item No.** - E-27

**Closed:** Y

**Date of E-Mail** - 02/10/03

**Author** - Blanch to Grobe

**Description of Issue** - Why did FENOC choose S. Haber when there are other more qualified individuals that could have been chosen? What are her qualifications? What other studies of safety culture at US Nuclear Plants has Dr. Haber performed? Is NRC aware that Dr. Haber worked for the same company that did the RCA last fall?

**Restart Checklist Item:** N/A

**Description of Resolution** - The choice of individuals to act as a consultant to a licensee is not an area under which the NRC has jurisdiction. Rather, the NRC bases its conclusions on licensee performance on the outcome of the work performed to address the performance deficiency. In this case, the performance deficiency relates to an inadequate management philosophy at the facility that fostered an environment where conditions adverse to quality were not promptly corrected nor aggressively identified. The reasons given for the licensee's choice of Dr. Haber were described by the licensee to the NRC during a public meeting held on January 30, 2003. The transcript of that meeting may be found on the NRC's Davis-Besse web page, or in ADAMS at Accession No. ml030580657.

**Reference Material** - ADAMS Accession No. ml030580657.

**RAM Item No.** - E-28

**Closed:** Y

**Date of E-Mail** - 03/13/03

**Author** - D. Collins to Grobe

**Description of Issue** - Is NUREG-1756 being used to evaluate safety culture at D-B?

**Restart Checklist Item:** N/A

**Description of Resolution** - The answer to the question is no. The NUREG is not applicable for the evaluations of safety cultures. The NUREG, "Safety Culture: A Survey of the State-of-the-Art," was prepared for the Advisory Committee on Reactor Safeguards to identify what existed in industry, including the nuclear industry, at that time. It was not intended to be a list of criteria to be utilized in inspecting a licensee's organizational performance.

**Reference Material** - None.

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**RAM Item No.** - E-29

**Closed:** Y

**Date of E-Mail** - 03/13/03

**Author** - D. Collins to Grobe

**Description of Issue** - If E-28 is no, why not and what alternate method is being used to evaluate safety culture acceptability?

**Restart Checklist Item:** N/A

**Description of Resolution** - As noted in the response to E-28, the NUREG was never intended to serve as a set of criteria to evaluate the performance of a licensee. Rather, the NRC's inspection team is conducting inspections to ensure that Davis-Besse thoroughly evaluated their past performance and identified all significant root causes. The team also is assessing the corrective actions to ensure they have been properly structured to address the root causes, and that methods to measure the effectiveness of the corrective actions have been developed. The team's inspection activities are based on existing NRC guidance (NRC Inspection Procedures 71152 "Problem Identification and Resolution" and 40001 "Resolution of Employee Concerns" and the 1989 and 1996 Policy Statements) to review the licensee's employee concerns program and safety conscious work environment, and internationally recognized guidance (International Safety Advisory Group (INSAG) documents: 4, "Safety Culture," 11 "Developing Safety Culture in Nuclear Activities: Practical Suggestions to Assist Progress," 13 "Management or Operational Safety in Nuclear Power Plant," and 15 "Key Factors in Strengthening Safety Culture.") to evaluate the effectiveness of the utility's management and human performance corrective actions. Upon completion of the inspection, the team will issue inspection report No. 50-346/03-12, documenting assessments and conclusions.

**Reference Material** - Inspection Report No. 50-346/03-12 and panel meeting minutes of April 3, 2003.

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**RAM Item No.** - E-30

**Closed:** Y

**Date of E-Mail** - 05/02/03

**Author** - Mr. Lochbaum

**Description of Issue** - What is the status of generic communications regarding the containment sump performance.

**Restart Checklist Item:** N/A

**Description of Resolution** - Issue not a Davis-Besse restart issue. Issue relates to desire on the part of Mr. Lochbaum to keep up with generic issue resolution. Issue is closed for purpose of Davis-Besse restart.

**Reference Material** - Platt's Inside NRC, May 5, 2003 edition, article entitled "Forthcoming Containment Sump Blockage Bulletin Surprises Industry"

**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.

March 22, 2004

**RAM Item No.** - E-32

**Closed:** Y

**Date of E-Mail** - 05/21/03 at 10:29 am

**Author** - Lochbaum

**Description of Issue** - Grobe to address to Lochbaum: How does the 0350 Panel intend to assure that any findings from the ongoing investigation are indeed addressed before restart?

**Restart Checklist Item:** N/A

**Description of Resolution** - The response was provided to Mr. Lochbaum by letter from Grobe dated August 1, 2003 (ADAMS Accession No. ml0321306630).

**Reference Material** - ADAMS Accession No. ml0321306630.

**RAM Item No.** - E-33

**Closed:** Y

**Date of E-Mail** - 06/18/03

**Author** - Gurdziel to Lipa

**Description of Issue** - Multiple issues raised regarding information presented in inspection report 03-13.

**Restart Checklist Item:** N/A

**Description of Resolution** - Christine called Mr. Gurdziel on June 19, 2003, and explained the context of the inspection report to him. At the conclusion of the conversation, Mr. Gurdziel was satisfied that his concerns had been addressed.

**Reference Material** - None.

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**RAM Item No.** - E-34

**Closed:** Y

**Date of E-Mail** - 07/01/03

**Author** - Gurdziel to Lipa (& Telecon to Grobe)

**Description of Issue** - Respond to E-mail concerning the adequacy of the new sump based on Gurdziel's review of report 03-06.

**Restart Checklist Item:** N/A

**Description of Resolution** - Jack Grobe spoke with Tom Gurdziel by phone on July 1, 2003, and answered all his questions on the sump report (Inspection Report No. 03-06). During the call, which Mr. Gurdziel initiated, Mr. Gurdziel stated that he was satisfied with the answers he received and had no further questions. No further action is necessary.

**Reference Material** - None.

**RAM Item No.** - E-35

**Closed:** Y

**Date of E-Mail** - 7/1/03

**Author** - Ballard

**Description of Issue** - Respond to individual who sent an e-mail to the OEWEB web page and cc OEWEB with response to the individual. The individual's concern was that the NRC make public safety our number one priority and not be influenced by FirstEnergy.

**Restart Checklist Item:** N/A

**Description of Resolution** - A response was developed by OPA and co-ordinated with NRR, the 0350 Panel, and NRC management. Responses were sent to all individuals who either e-mailed or wrote to the NRC concerning the Davis-Besse facility. A copy of the response that was sent back is located in ADAMS at Accession No. ml033370002.

**Reference Material** - ADAMS Accession No. ml033370002.

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**RAM Item No.** - E-36

**Closed:** Y

**Date of E-Mail** - Various

**Author** - Various

**Description of Issue** - Respond to individuals regarding request that D-B be permanently shut down. (see AITS R03-0152.)

**Restart Checklist Item:** N/A

**Description of Resolution** - A response was developed by OPA and co-ordinated with NRR, the 0350 Panel, and NRC management. Responses were sent to all individuals who either e-mailed or wrote to the NRC concerning the Davis-Besse facility. A copy of the response that was sent back is located in ADAMS at Accession No. ml033370002. Letters and e-mails continue to come in, and this response is being provided to all.

**Reference Material** - ADAMS Accession No. ml033370002.

**RAM Item No.** - E-37

**Closed:** Y

**Description of Issue** - Riccio 7/31/03 e-mail on adequacy of design basis and lack of adequate safety evaluations associated with installed modifications

Davis-Besse Communications Team recommended to Panel and the Panel determined that closure of this item is not needed for restart. This item is tracked on the Davis-Besse communications matrix.

**Reference Material** - Riccio 7/31/03 e-mail

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**RAM Item No.** - E-38

**Closed:** Y

**Date of E-Mail** - 8/1/03 & 8/5/03 to Grobe

**Author** - Blanch

**Description of Issue** - Provide answer to the ten questions asked regarding methodology of site to address hydrogen buildup in containment given inoperability of hydrogen analyzers.

**Restart Checklist Item:** N/A

**Description of Resolution** - By letter dated October 9, 2003, from the Panel Chairman to Mr. Blanch, each of the ten questions was provided a specific answer. The letter is available in ADAMS.

**Reference Material** - Letter to Blanch dated October 9, 2003 (ADAMS Accession No. ml032820576).

**RAM Item No.** - E-39

**Closed:** Y

**Date of E-Mail** - 08/19/03

**Author** - Blanch

**Description of Issue** - Respond to Blanch's question regarding accuracy of article describing Blaster Worm attack on D-B SPDS system.

**Restart Checklist Item:** N/A

**Description of Resolution** - By letter dated November 19, 2003, from Mr. Grobe to Mr. Blanch, the information concerning the virus/worm attack on the Davis-Besse computers was provided. Also referenced in the response was the letter provided to Congressman Markey on the same subject.

**Reference Material** - Letter to Blanch dated November 19, 2003 (ADAMS Accession No. ml033360568).

March 22, 2004

**RAM Item No.** - E-40

**Closed:** Y

**Date of E-Mail** - 08/21/03

**Author** - Blanch

**Description of Issue** - Respond to Blanch's questions concerning the Slammer virus shutting down the SPDS at Davis-Besse in January 2003, reportability, etc.

**Restart Checklist Item:** N/A

**Description of Resolution** - By letter dated November 19, 2003, from Mr. Grobe to Mr. Blanch, the information concerning the virus/worm attack on the Davis-Besse computers was provided. Also referenced in the response was the letter provided to Congressman Markee on the same subject.

**Reference Material** - Letter to Blanch dated November 19, 2003 (ADAMS Accession No. ml033360568).



March 22, 2004

**RAM Item No.** - E-41

**Closed:** Y

**Date of E-Mail** - 10/06/03

**Author** - Blanch

**Description of Issue** - Respond to Blanch's questions concerning the reasoning for pulling control rods during cooldown and whether such complies with the licensee's TS.

**Restart Checklist Item:** N/A

**Description of Resolution** - Davis-Besse Operations Procedure DB-OP-06903, "Plant Shutdown and Cooldown," Revision 11 provided an option to cooldown the reactor coolant system with the Group 1 Safety Control Rods fully withdrawn. The reason given in the procedure is to provide trippable reactivity prior to the addition of positive reactivity [potentially caused by a boron dilution accident].

The Technical Specifications do not directly address this issue (whether or not the Group 1 Safety Control Rods can be withdrawn during reactor coolant system cooldown). How it does deal with the issue of reactivity control is primarily via Technical Specification 3.1.1.1. This Technical Specification requires for operational Modes 1, 2, 3, 4, and 5 that shutdown margin shall be greater than or equal to 1%  $\Delta k/k$ . Additionally, by definition, during operational Modes, 3, 4 and 5,  $K_{eff}$  is required to be maintained less than 0.99 [ $K_{eff} = 0.99$  is approximately 1%  $\Delta k/k$ ].

During the transition from operation Mode 3 [Hot Standby] to Mode 5 [Cold Shutdown], even with the Group 1 Safety Rods withdrawn, the reactor coolant system boron concentration provided a reactivity margin to criticality of approximately 7.5%  $\Delta k/k$  [or  $K_{eff}$  of approximately 0.93 at 532 F] and 7.0%  $\Delta k/k$  [or  $K_{eff}$  of approximately 0.935 at 70 F]. This same reactor coolant boron concentration provided an approximate 2.0%  $\Delta k/k$  [or  $K_{eff}$  of approximately 0.98] with all the control rods fully withdrawn.

The advantages of this practice were unclear and as a result, the licensee modified their procedures to prevent any Safety Control Rods being withdrawn during plant cooldown. This issue was documented in Inspection Report no-346/2003-022, a copy of which will be provided to Mr. Blanch as he is on distribution for that report.

**Reference Material** - NRC Inspection Report No. 50-346/2003-022.