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From: John Grobe III
To: Anthony Mendiola; Christine Lipa; Dave Passehl; James Shea; Jan Strasma; Jon Hopkins; Randal Baker; Roland Lickus; William Ruland
Date: 02/17/2004 8:02AM
Subject: Re: Fwd: Dr. Ben Wisner's testimony for 12 February Davis Besse meeting

OK

>>> Christine Lipa 02/16/04 02:10PM >>> RII
The attached email and the letter he references from Ohio Citizen Action need to be dispositioned by panel or the DBComm team. I suggest we put these 2 incoming items and the others (Kucinich, Lueke, Redfern, etc) that we received at the 2/12 meeting on our panel agenda to discuss all of them and decide what needs to be done as far as responding, ticketing, etc.

Christine

H-6

From: Ben Wisner <bwisner@igc.org>
To: <cal@nrc.gov> C. Lipa, RTU
Date: 02/12/2004 12:47PM
Subject: Dr. Ben Wisner's testimony for 12 February Davis Besse meeting

Dear Christine Lipa,

Unfortunately I am unable to physically attend either of the meetings today to discuss the future of Davis Besse Nuclear Facility. I would be grateful, therefore, if you would include this brief email among the comments made by members of the public. I would also be grateful if you would copy this email to James Caldwell.

I testified previously, in person, in December 2003. I am a citizen of Oberlin, Ohio, downwind of the Davis Besse facility. I therefore have a personal interest in its safety. Furthermore, I am a retired geography professor whose continuing career in disaster risk management spans 37 years. I have worked domestically with the City of Los Angeles, FEMA, and USGS on various projects. Internationally, I have worked with the World Health Organization, Kyoto University, Swiss Federal Institute of Technology, and the International Institute for Applied Systems Analysis.

During these 37 years I have had as my specialty the economic and political determinants of "safety culture". The second edition of my text book, At Risk, was just published in London by Routledge in November 2003.

It is therefore with acute personal and professional salience that I address the issue of whether First Energy Corporation could possibly have turned around its lamentably poor "safety culture" at Davis Besse since the NRC's last inspection in December 2003.

My judgment is "no"; that is simply not possible. The reasons are most clearly and admirably expressed in the letter that Sandy Buchanan (Ohio Citizens Action) has sent to James Caldwell (http://www.ohiocitizen.org/campaigns/electric/2004/buchanan_caldwell.html). I will not repeat her points in that letter. I wish only in this brief message to underscore their complete accuracy and relevance to the NRC's ultimate decision about restarting the plant.

What I would like to add myself are two related points.

First, I find it remarkable and very troubling that the NRC does not actually have any standards for assessing what a good "safety culture" is. Without a set of established, agreed, refereed standards and benchmarks, how can the NRC judge one way or another? I realize this is a tricky argument because the absence of such standards might be grounds for First Energy Corporation, if they were foolish enough, to sue the NRC if you find the plant continues to lack a "safety culture". On the other hand, the prudent thing would seem to me to be to delay restart until the NRC can actually put together nationally refereed and accepted standards for assessing what is a good "safety culture" and what is not.

I take the scheduled 19 February 2004 workshop on this subject as another solid step in such a direction. I applaud the NRC for its

continuing efforts to make more rigorous the assessment of "safety culture". However, wouldn't it be the rational and prudent thing to do to delay restart until the NRC can use solid, rigorous, agreed standards to assess the state of "safety culture" at Davis Besse?

My second point is to remind the NRC and First Energy Corporation of a very interesting proposal made by a group of four Ohio Congressional Representatives. They suggested that First Energy consider beginning to phase in the use of non-nuclear fuel to generate energy at this plant as a part of the re-start plan. (See: <http://www.ohiocitizen.org/campaigns/electric/pre2003/fourcgp.html>). On 21 December 2003, I wrote to Ottawa County Commissioner Carl Koebel endorsing this idea. Such a plan would gradually increase the amount of non-nuclear fuel based energy generation over time, so that by the time of de-commissioning, both First Energy and the country would not still have a productive asset.

If the NRC were to delay approval for re-start pending creation of rigorous standards for the assessment of "safety culture", that would give First Energy a chance to revisit this ingenious plan, seek financing for it, and set it in motion. I am reasonably sure that this act by First Energy, investing in the long term economic future of Ottawa county as well as in non-nuclear technology, would do a great deal to win over skeptics.

Thank you for accepting my testimony.

Yours sincerely,

[signed]

Dr. Ben Wisner
Environmental Studies Program, Oberlin College
& London School of Economics
& Benfield Hazard Research Centre, University College London

CC: <rjs2@nrc.gov>, <jag@nrc.gov>, "Sandy Buchanan [Ohio Cit Act]" <sbuchanan@ohiocitizen.org>, Richard Wilkins <rgwilkins@firstenergycorp.com>, <bwisner@igc.org>

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