

June 2, 2004

MEMORANDUM TO: Davis-Besse Oversight Panel  
FROM: John A. Grobe, Chairman, Davis-Besse Oversight Panel */RA/*  
SUBJECT: MINUTES OF INTERNAL MEETING OF THE DAVIS-BESSE  
OVERSIGHT PANEL

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 December 9, 2003. Attached for your information are the minutes from the internal meeting of the Davis-Besse Oversight Panel, the Closure Basis Document to Support Closure of Restart Checklist Item 5.d, the approved RAM Closure Forms, and the "Open" Action Items List.

Attachments: As stated

cc w/att: D. Weaver, OEDO  
J. Caldwell, RIII  
G. Grant, RIII  
S. Reynolds, DRP  
B. Clayton, EICS  
DB0350

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OFFICE	RIII	RIII	RIII	RIII
NAME	RBaker/dtp	DPassehl	JGrobe for CLipa	JGrobe
DATE	05/17/04	06/01/04	06/ /04	06/02/04

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

DATE: December 9, 2003

TIME: 9:30 a.m. Central

ATTENDEES:

C. Lipa	W. Ruland	S. Thomas
M. Phillips	A. Mendiola	J. Lara
R. Baker	J. Hopkins	R. Daley
	J. Stang	

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 Plant Status and Inspector Insights and Emergent Issues List

S. Thomas led a discussion of plant status and inspector insights and emergent issues. The plant is currently in Mode 5. The licensee expects to complete installation of the breaker coordination bucket modifications today, expects to complete ECCS room cooler replacement Thursday, 12/11/03, and expects to complete work on the HPI pumps Friday, 12/12/03. Containment closeout is scheduled for Friday, 12/12/03.

3. Discuss New/Potential Licensing Issues

J. Hopkins briefed the Panel on the status of licensing issues. The licensee expects to have responses to the 5 critical questions needed to close out issues from the March 2002 Steam Generator inspection submitted today. The licensee committed to submit the responses to the remaining 8 questions of the RAI promptly. The Panel suggested discussing the licensee's plans for conducting a mid-cycle outage if required to shut down in March to complete the 2004 Steam Generator inspection.

4. Brief Panel on Proposed Action Concerning IN for TSP

W. Ruland led a discussion on moving forward with the IN on TSP. The issue is that, based upon known facts, the described issues, as written in the Information Notice, is not consistent with NRC policy. Therefore, there are two options available. Either rewrite the Information Notice to clearly define the issues, or draft a letter response to the CI explaining why an Information Notice is not warranted.

**NEW ACTION ITEM (224) - D. HILLS TO REWRITE THE PROPOSED INFORMATION NOTICE ON TSP TO BE GENERIC AND REFLECT ATTAINABLE PLANT CONDITIONS AND WHAT INFORMATION SHOULD BE DISSEMINATED TO THE INDUSTRY CONCERNING BORIC ACID CORROSION CONTROL PROGRAMS.**

5. Brief Panel on Review of the Integrated Restart Procedure and Recap Resident PMT and Surveillances for Closure of Restart Checklist Item 5.d, "Test Program Development and Implementation"

S. Thomas summarized the post maintenance testing and surveillances performed to support closure of Restart Checklist Item 5.d, "Test Program Development and Implementation." The Panel approved closure of Restart Checklist Item 5.d, which will be documented in inspection report 50-346/03-25. **THE APPROVED CLOSURE BASIS DOCUMENT IS ATTACHED TO THESE MINUTES.**

6. Discuss Communication Status

J. Stang provided the Panel with a status update on communications issues. The Panel discussed the recent document posted on the Ohio Citizens Action Group website which describes an analysis of the licensee's November 2003 SCWE survey results. The Panel decided that the website posting is not a petition and any response will have to wait until an actual letter is received by the NRC from the Ohio Citizens Action Group.

A. Mendiola briefed the Panel on a concern raised by Laura Gerke that if a restart decision is completed around the upcoming holidays, it may present a challenge to get concurrences or inform members of Congress without prior coordination.

C. Lipa informed the Panel that J. Caldwell is focusing on the latest Q&As and will let the Panel know if any additional information is requested.

**NEW ACTION ITEM (225) - C. LIPA TO SEND OUT THE NEWEST REVISION OF THE RESTART COMM PLAN FOR PANEL REVIEW.**

Regarding this item, the newest revision is in final and will be brought to Panel for review 12/12.

**NEW ACTION ITEM (226) - A. MENDIOLA TO VERIFY WITH MEL FIELDS THAT GREENPEACE HAS RECEIVED THE RESPONSE TO 2.206 AND THAT THERE ARE NO OUTSTANDING ISSUES.**

7. Brief Panel on Review of the CATI Findings and Open Technical Issues

J. Lara briefed the Panel on the status of reviewing CATI findings and open technical issues being addressed with the licensee. The CATI team is assessing how the licensee reviews SCAQs, to determine if a concern remains in this area, and how trending will be re-implemented by the licensee. The licensee committed to resuming trending and will discuss this issue during the November 12 public meeting.

The CATI team is also developing criteria for what additional actions are required by the NRC, and what additional commitments are required from the licensee to permit closure of Restart Checklist Item 3.a.

J. Lara also briefed the Panel on several technical issues which remain unresolved:

- 1) HPI pump minimum recirculating flow acceptability,
- 2) Voltage protection issues, and
- 3) Inadequate protective circuits.

These issues will be discussed with the licensee during the public meeting tomorrow.

8. Brief Panel on New Information Related to Appendix R - Procedure DB-OP-02519

R. Daley informed the Panel that the revised TIA, incorporating new issue resolutions involving the licensee abnormal procedure DB-OP-02519 has been provided to and is being reviewed by the Panel Chairman.

9. Discuss Allegations: 1) New; 2) Determine If Required to Be Resolved Prior to Restart; and 3) Requested Extensions

D. Passehl discussed the status of outstanding allegations. There remains one allegation which requires resolution prior to restart involving the EDG Square-D relays. A. Mendiola will brief the Panel on a new potential allegation issue under review by NRR on Thursday, 12/11/03.

10. Review Key Items Scheduled for Next Panel Meetings

C. Lipa discussed key items scheduled for upcoming Panel meetings.

11. Discuss RAM Closure Forms

M. Phillips led a review of RAM closure items. **THE RESTART ACTION MATRIX ITEMS THAT THE PANEL APPROVED FOR CLOSURE ARE ATTACHED TO THESE MINUTES.**

12. Discuss Initial Draft of Confirmatory Order for Comments

W. Ruland led a review of the draft Confirmatory Order. The Panel discussed using stronger language in the letter which transmits the Order to the licensee. W. Ruland will provide the Panel's comments to F. Lyon, who will provide the revised draft to the Panel for review at the next Panel meeting.

13. Discuss Items for Licensee Weekly Calls

C. Lipa informed the Panel that the licensee's weekly call would be delayed due to the public meeting addressing CATI Issues being held in the Region III offices tomorrow.

14. Discuss Update Milestones and Commitments

The Panel reviewed and discussed upcoming milestones and commitments.

15. Discuss Action Items

Three new Action Items were added to the open action items list. **THE UPDATED "OPEN" ACTION ITEMS LIST IS ATTACHED TO THESE MINUTES.**

## **Closure Basis for Restart Checklist Item 5.d, “Test Program Development and Implementation”**

The scope of the inspection activities used to evaluate this item included verification that the licensee adequately:

- performed post-maintenance and post-modification testing of equipment important for the safe operation of the plant;
- demonstrated the leak tightness of the containment building;
- performed testing activities which demonstrated that the RCS and associated piping had no pressure boundary leakage;
- performed specific inspections of both the control rod drive nozzle penetrations on the upper reactor head and the incore nozzle penetrations on the bottom reactor head, that verified no leakage was present; and
- developed an integrated restart testing plan.

### **Evaluate the Adequacy of Post Maintenance and Modification Testing**

The resident staff performed inspections of 17 post maintenance tests, 23 surveillance tests, and 3 temporary modifications. Included in these samples were inspection activities which assessed post modification testing. Specifically:

- Integrated Safety Features Actuation Testing (post relay replacement);
- HPI Pump Testing (post modification testing);
- Emergency Diesel Generator Testing (post air start system modifications);
- Decay Heat Pit (integrity test); and
- RCP Testing (post refurbishment for loop 1 pumps; leak testing posting seal RTD removal).

These inspections were documented in resident Inspection Reports 50-346/03-02, 50-346/03-04, 50-346/03-013, 50-346/03-015, 50-346/03-17, 50-346/03-18, and 50-346/03-22.

### **Perform ILRT of Containment Vessel**

This inspection activity was documented in inspection report 50-346/03-05(DRS).

A Special Inspection was performed to evaluate the conduct of the containment integrated leak rate test at the Davis-Besse site. During this inspection, the inspectors reviewed a calculation for containment volume, reviewed the test procedure, monitored prerequisite activities such as valve lineups, containment walkdowns, and local leak rate tests, witnessed the performance of the test, monitored system restoration activities, and reviewed the results of the test after they were approved by licensee management.

The inspectors concluded that containment integrity had been restored after the containment had been opened for replacement of the reactor head. Based on the results of this inspection, no findings of significance were identified.

### Perform RCS Leakage (low and high pressure) Tests

These inspection activities were documented in Inspection Reports 50-346/03-13 and 50-346/03-23.

The resident staff evaluated the licensee performance of the initial pressure tests conducted on the RCS and associated piping. The licensee developed procedure DB-PF-03010, "RCS Leakage Test," to provide guidance for performing the reactor coolant leak checks. This procedure was used as guidance for the 50 psig check, and formally implemented at 250 psig. As part of this evaluation, the inspectors ensured that equipment deficiencies identified during the walkdowns associated with the tests were documented, repaired, or had appropriate corrective actions assigned.

The RCS Leakage Test was performed at normal operating pressure. A special inspection of licensee activities associated with leak testing of the RCS, inspection of the lower head penetrations, and replacement head was performed. This inspection was conducted by Region III based and resident inspectors.

### Perform a Visual Inspection of the Reactor Pressure Vessel Bottom In-core Nozzles After Heatup

This inspection activity was documented in inspection report 50-346/03-23.

In preparation for the bottom head examination following the 7 day hold at NOP, the inspector reviewed digital photographs and video of the baseline examination conducted May 8, 2003. Procedure EN-DP-01500 "Reactor Vessel Inspection Procedure", Revision 4, and certifications for the inspection personnel were also reviewed prior to the bottom head inspection. General condition of the bottom head was directly observed through an opening in the insulation after the NOP test. The inspector observed approximately 75 percent of the inspection real time. Comparisons of this inspection to the baseline were performed for several nozzles.

Digital photographs and video of the baseline inspection conducted May 8, 2003, showed that some white or rust colored residue remained in the area surrounding the penetrations even though the bottom head was pressure washed. The residue appeared thin and tightly adhered. Some residue was noted in the annular space between the nozzle and vessel bore and evidence of tape remained on the head in spots. Camera resolution was judged to be excellent. Procedure EN-DP-01500 "Reactor Vessel Inspection Procedure", Revision 4, was reviewed and found to contain adequate guidance for performing the inspection.

The inspectors observed approximately 75 percent of the post NOP examination which was conducted on October 6-7, 2003. A VT-2 qualified contract inspector and a boric acid control qualified inspector from the Davis-Besse staff performed the inspection. Proper location was verified by both inspectors and the remote camera operator. Visual acuity and lighting was verified at the beginning and end of each shift. Specifically, the procedure required the camera system to be able to resolve Code VT-2 sized alpha numeric characters; however, the VT-1 sized letters were also readily visible. The inspection was recorded on video tape. Overall, the resolution was judged to be excellent.

The inspection did not identify any pressure boundary leakage or lower head corrosion beyond a light coat of surface rust as described in Bulletin 2003-02.

### Restart Test Plan

The inspectors reviewed the Davis-Besse Integrated Restart Test Plan, Revision 01 (dated December 5, 2003). This plan documented the operational improvement initiatives and plan for the transition from operational Mode 5 to 100 percent power. Specific areas addressed were:

- An enhanced implementation of the Integrated Restart Test Plan for Restart which incorporated corrective actions that developed from the Operational Readiness Assessment Report, Collective Significance Review (CR 03-08418) and NQA assessment of the NOP test;
- The organizational structure of the license had transitioned to a normal operational organization. Specific assignments regarding the implementation of the Restart Test Plan, which included an Integrated Restart Test Plan Project Manager, Integrated Restart Test Plan Shift Coordinators, and Restart Assessment Team Inspection Liaisons had been assigned;
- The licensee developed and implemented an Operations Improvement Action Plan to address performance deficiencies discovered during the NOP test;
- On-shift operations oversight managers had been assigned to provide real-time assessment and feedback of operator performance. These individuals would remain in place for 4 weeks after attaining 100 percent power; and
- Operational Readiness Assessment Plan for Restart assessments (IAW DBBP-VP-0002) will be performed prior to entering operational Mode 4 and Mode 2. Additionally, effectiveness reviews are planned prior to initial criticality, initial synchronization of the generator to the electric grid, and subsequent to placing the second main feed water pump in service.

### Conclusion

The inspection activities, as described above, documented sufficient inspections to close Restart Item 5.d, "Test Program Development and Implementation." This item was discussed with the Davis-Besse 0350 Panel, on December 9, 2003, and the panel concurred that the item should be closed. Closure will be documented in resident inspection report 50-346/03-25.

**RAM Items Approved for Closure at Panel    December 9, 2003**

**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).

**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).

**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 with 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.

**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.

**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-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).

**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).

**RAM Item No.** - L-85

**Closed:** Y

**Date of Letter** - 02/08/03

**Author** - Gurdziel (G-19)

**Description of Issue** - Numerous examples of how the licensee mis-identifies primary coolant leakage, including reactor coolant pumps having longstanding casing gasket leakage.

**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, the appropriateness of the licensee's methodology for identifying coolant leakage, and that none of the pumps actually showed evidence of reactor coolant leakage during operations.

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

**RAM Item No.** - L-89

**Closed:** Y

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

**Author** - Lochbaum

**Description of Issue** - Were the system assessments at D-B as rigorous as those conducted at Millstone and Cook in flushing out heretofore unidentified non-conforming conditions?

**Restart Checklist Item:** N/A

**Description of Resolution** - The licensee's System Health Assurance (SHA) Plan was one of seven building blocks identified as part of the licensee's Return to Service Plan following identification of the degradation of the reactor head. The intent of the SHA plan was to review plant systems prior to restart to ensure that these systems were in a condition that would support safe and reliable plant operation. The plan consisted of three review programs: (1) an

Operational Readiness Review; (2) a System Health Readiness Review (SHRR); and (3) a Latent Issues Review (LIR). The NRC's initial inspection of the SHA plan (documented in Inspection Report 50-346/2002-013) monitored all aspects of the plan's implementation on a real-time basis, including quality assurance oversight. At the close of that inspection a limited number of SHRRs and none of the LIRs had been completed. The NRC subsequently conducted an inspection to review a sample of completed SHRRs and all five of the LIRs (documented in Inspection Report 50-346/2003-003). Based on the results of these inspections, the NRC staff concluded that "the System Health Assurance Plan met its intent to review plant systems prior to restart to ensure that these systems were in a condition that would support safe and reliable plant operation and that the discovery phase of the program was conducted in a thorough and methodical manner in accordance with the procedures established for these reviews. The original stated intent of the program was to provide assurance that important plant systems were able to perform their safety functions and support plant restart and operation. In fact, what occurred was that the program identified many systems where either significant deficiencies, or a large number of deficiencies, existed such that these systems were not in a condition to support restart and operation and that corrective action was needed to restore these systems. Further, we noted that the most significant deficiencies were found in vital systems such as service water, emergency core cooling, diesel generator, and electrical distribution." As a result of the efforts, the licensee has performed many significant hardware modifications, including the emergency sump, high pressure coolant injection pumps, containment air coolers, and electrical distribution system to name a sample. The inspections did not make an attempt to compare the licensee's performance with other facilities, rather, the inspections were focused on ensuring the licensee's efforts were appropriate and adequate to identify all potential system problems and bring the identified problems to resolution. The licensee's program for Resolution of Open Design Questions, which was developed as a result of the discovery phase, had two fundamental elements. One involved determining extent of condition of the deficiencies identified during the discovery phase and the second was resolution of system deficiencies through the use of the station's established corrective action program. In NRC Inspection Report 50-346/2003-003, the NRC documented its conclusions relative to monitoring and evaluating the extent of condition review element. The inspection concluded "these extent of condition reviews were conducted in an appropriate manner with acceptable results." Resolution of identified deficiencies was examined by an NRC Corrective Actions Team inspection (documented in Inspection Report 50-346/2003-010).

**Reference Material** - NRC Inspection Report Nos. 50-346/2002-013 dated February 26, 2003, (ADAMS Accession No. ml030630314), 50-346/2003-003 dated October 21, 2003, (ADAMS Accession No. ml032950012), and 50-346/2003-010 which will be issued later in December 2003.

**RAM Item No.** - C-32

**Closed:** Y

**Description of Issue** - Emergency Diesel Generator (EDG) voltage/frequency control and room temperature.

**Restart Checklist Item:** 5.b

**Description of Resolution** - The voltage/frequency issue related to the large voltage and frequency dip that would occur on the safety related bus during the first block load following the design basis loss of offsite power in conjunction with a loss of coolant accident (LOOP/LOCA). This issue was reviewed by the Electrical Issues Inspection Team, who found that the

licensee's resolution of the issue was adequate. Corrective Actions 14 and 15 of CR 02-05385 addressed Voltage/Frequency dips during EDG block loading. These action items referenced Operability Evaluation 2003-0009, Rev. 1, for CR 03-00949. This Operability Evaluation addressed pertinent operability issues such as the increased time (Caused by the short duration dip in bus voltage and frequency.) required for safety-related motors to develop torque and accelerate their loads during the design basis LOOP/LOCA.

As stated in the Operability Evaluation (OE 2002-0039) for Condition Report (CR) 02-09391, high temperatures in the EDG rooms may have short-term effects that reduce reliability or cause failure of electrical and mechanical components that support the operation of the EDGs, and may have long-term effects that accelerate the aging of components. The original design and licensing basis EDG room temperature was 120 degrees F. It was determined that the temperature of the EDG rooms could potentially exceed 120 degrees F, and, two times in the past, had exceeded this temperature in localized areas of the room.

Based upon this information, in support of OE 2002-0039, the Design Engineering staff determined that an EDG room temperature of 130 degrees Fahrenheit was acceptable for the electrical and controls equipment in the room. Additionally, ECR 02-0858, Installation of New Ventilation Fans, and ECR 03-0170, Installation of Electrical Panel Ventilation Ducts, have been implemented to reduce localized heating in the EDG electrical cabinets. Although these modifications are not yet complete, when finished they will provide additional cooling air to the cabinets to reduce temperatures. Also, ECR 03-0101, Insulation of Diesel Exhaust Manifold and Outlet Piping, has been implemented adding thermal insulation to the EDG exhaust manifold and components. This modification reduces the heat load in the EDG rooms during EDG operation. ECR 03-0101 has been completed.

Because of the temperature concerns in the EDG room, the licensee has determined that the EDG is operable when the outside temperature is 95 degrees or lower with two EDG room ventilation fans available. With only one fan available, EDG operability can only be assured if the outside temperature is 71 degrees or lower. Based upon discussions with the licensee, final implementation of the associated ECRs will provide an additional margin of approximately 5 degrees. Since operability of the EDGs are ensured by appropriate entry into the Technical Specification LCOs, the temperature issue can be closed.

In the long term, the licensee intends to modify the USAR to address EDG operations. In the interim, the licensee has an Operability Evaluation concluding that the EDGs are operable but degraded because the EDGs do not meet their current USAR description. The Office of Nuclear Reactor Regulation has reviewed this position and determined that even with the licensee concluding that change can not be made under 50.59, the licensee can restart with the operable but degraded EDGs (ie, the license amendment does not need to be issued first). The licensee's staff concluded that a license amendment submittal was needed because of the new 50.59. Specifically, they concluded that the USAR change could likely have been done under the old 50.59; however, the question in the new 50.59 is question viii, which says: Result in a departure from a method of evaluation described in the FSAR (as updated) used in establishing the design bases or in the safety analyses.

Because the USAR statement that Davis-Besse does not meet is also in Safety Guide 9, which they are committed to, the licensee concluded that change to USAR did involve a departure from a method of evaluation (eg, Safety Guide 9) described in FSAR used in establishing design bases, hence the need for a license amendment.

**RAM Item No.** - CAL-03

**Closed:** Y

**Description of Issue** - Evaluate and disposition the extent of condition throughout the reactor coolant system relative to the degradation mechanisms that occurred on the RPV head.

**Restart Checklist Item:** 2.c

**Description of Resolution** - The NRC conducted two inspections into the licensee's extent of condition program. The inspections were documented in reports 50-346/2002-009 and 50-346/2002-012. While Inspection Report 50-346/2002-012 concluded that the "Davis-Besse Containment Health Assurance Plan" was effectively implemented, three unresolved items associated with corrective actions on components potentially affected by boric acid corrosion were identified. These unresolved items were associated with the licensee's corrective actions for corrosion of electrical conduit, the bottom nozzles on the reactor vessel, and the containment air coolers. Additionally, at that time, the licensee's staff had completed apparent cause determinations with designated corrective actions for only a small number of the components potentially affected by boric acid corrosion.

Subsequently, inspections were performed to evaluate the effectiveness of the licensee's corrective actions to address the remaining components potentially affected by boric acid corrosion and resolve the three open unresolved items. The NRC's inspections noted that the three unresolved items related to the corrosion of electrical conduit, the bottom nozzles on the reactor vessel, and the containment air coolers had been effectively addressed to ensure that these components were operable and capable of performing their safety-related functions. The inspections also determined that all of the components potentially affected by boric acid corrosion had been appropriately addressed in the corrective action process and that the schedules for completion of the planned corrective actions were acceptable. The results of the inspections are documented in NRC Inspection Reports 50-346/2003-010, 50-346/2003-022, and 50-346/2003-023.

**Reference Material** - NRC Inspection Report Nos. 50-346/2002-009, 50-346/2002-012, 50-346/2003-010, 50-346/2003-022, and 50-346/2003-023.

**RAM Item No.** - SUP-25

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Inspection Preparation: Review inspection reports and critique findings from EP related event response and drills.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. Based on acceptable licensee performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item. Inspection Procedure 71114.05 ("Correction of Emergency Preparedness Weaknesses and Deficiencies") provides the appropriate inspection guidance for this item.

This Inspection Procedure was accomplished during this ROP cycle and documented in Inspection Report 50-346/02-05. Additionally, Inspection Procedure 71114.01 ("Exercise Evaluation") provides the necessary guidance for this item. This Inspection Procedure was accomplished during this ROP cycle and documented in Inspection Report 50-346/03-14. Finally, a conversation was conducted with the acting EP Manager to discuss a potential negative trend (while still within the Green/acceptable band) in the Drill/Exercise Performance (DEP) Performance Indicator. The licensee has entered the item into the corrective action program and conducted remedial training for some of the recurring problems. Additionally, the licensee plans to address PI opportunities in upcoming Operator training. Finally, the licensee conducted a successful drill in October 2003 that provided four successful opportunities for the PI.

**Reference Material** - Inspection Report Nos. 50-346/2002-005 (ADAMS Accession No. ML022060551); and 50-346/2003-014 (ADAMS Accession No. ML031960596).

**RAM Item No.** - SUP-26

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Inspection Preparation: Review a summary of recent EP corrective actions.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. Based on acceptable plant performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item. Inspection Procedures 71114.02 ("Alert and Notifications System Testing"), 71114.03 ("Emergency Response Organization Augmentation"), and 71114.05 ("Correction of Emergency Preparedness Weaknesses and Deficiencies") provide the appropriate inspection guidance for this item. These Inspection Procedures were accomplished during this ROP cycle and documented in Inspection Report 50-346/02-05.

**Reference Material** - Inspection Report No. 50-346/2002-005 (ADAMS Accession No. ml022060551).

**RAM Item No.** - SUP-27

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Inspection Preparation: Review licensee analyses of corrective actions related to specific findings and general audits where available.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in

the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. Based on acceptable licensee performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item. Inspection Procedure 71114.05 ("Correction of Emergency Preparedness Weaknesses and Deficiencies") provides the appropriate inspection guidance for this item. This Inspection Procedure was accomplished during this ROP cycle and documented in Inspection Report 50-346/02-05.

**Reference Material** - Inspection Report No. 50-346/2002-005 (ADAMS Accession No. ML022060551).

**RAM Item No.** - SUP-28

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Inspection Preparation: Review recent changes to the Emergency Plan (Plan) changes.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. Based on acceptable licensee performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item. Inspection Procedure 71114.04 ("Emergency Action Level and Emergency Plan Changes") provides the appropriate inspection guidance for this item. This Inspection Procedure was accomplished during this ROP cycle and documented in Inspection Report 50-346/02-05. Additionally, this Inspection Procedure was performed and documented in Inspection Report 50-346/01-16, dated March 8, 2002.

**Reference Material** - Inspection Report Nos. 50-346/2001-016 (ADAMS Accession No. ML020710594) and 50-346/2002-005 (ADAMS Accession No. ML022060551).

**RAM Item No.** - SUP-29

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Inspection Preparation: Develop an inspection plan to address concerns identified as well as the inspection requirements.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line



item suggested in IP 95003. Based on acceptable licensee performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item.

**RAM Item No.** - SUP-39

**Closed: Y**

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Human Performance: Review specific problem areas and issues identified by inspections to determine if concerns exist in Human-System Interfaces including work area design and environmental conditions.

**Description of Resolution** - The attribute that affected human-system interface that contributed to the degradation of the reactor vessel head involved the service structure. Since the event occurred, the service structure was modified to ensure that all vessel penetration tubes were visible for inspection.

**RAM Item No.** - SUP-40

**Closed: Y**

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Human Performance: Conduct EP Emergency Response Organization Performance-Drills, in accordance with Inspection Procedure 82001, with a sampling of shift crews and management teams to assess their ability to implement the Emergency Plan.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. Note that Inspection Procedure 82001 is obsolete and was replaced by Inspection Procedure 71114.01 ("Exercise Evaluation") in April 2000. The issue summarized in SUP-40 appears to encompass the biennial exercise inspection, off-hours augmentation drills, and the ERO and DEP Performance Indicators. Based on acceptable licensee performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item. Inspection Procedures 71114.03 ("Emergency Response Organization Augmentation"), and 71151 ("Performance Indicator Verification") provide the appropriate inspection guidance for this item. These Inspection Procedures were accomplished during this ROP cycle and documented in Inspection Report 50-346/02-05. Additionally, Inspection Procedures 71114.01 ("Exercise Evaluation") and 71151 ("Performance Indicator Verification") were also accomplished during this ROP cycle and documented in Inspection Report 50-346/03-14.

**Reference Material** - Inspection Report Nos. 50-346/2002-005 (ADAMS Accession No. ML022060551); and 50-346/2003-014 (ADAMS Accession No. ML031960596).

**RAM Item No.** - SUP-43

**Closed: Y**

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Procedure Quality: Review a sample of Emergency Plan

Implementing Procedure (EIPs) changes against the requirements of the Plan and corrective action assessments. Determine if the EIP change process is adequate in correcting EIP related deficiencies and maintaining Plan commitments in EIP instructions.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. Based on acceptable licensee performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item.

**RAM Item No.** - SUP-45

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Equipment Performance: Determine if the licensee has effectively implemented programs for control and evaluation of surveillance testing, calibration, and post-maintenance testing.

**Description of Resolution** - This attribute was inspected as part of the System Health and Safety System Design Inspections (SSDI), which were documented in Inspection Report Nos. 50-346/2002-013 and 50-346/2002-014, respectively. The focus of the inspections was assuring the capability of safety significant structures, systems and components to support safe and reliable plant operation. Specifically, the inspections focused on review of activities as described in the "Davis-Besse System Health Assurance Plan." The plan consisted of three review programs: an Operational Readiness Review (ORR), a System Health Readiness Review (SHRR), and a Latent Issues Review (LIR). The inspection of this plan included reviewing the plans and procedures for the ORR, SHRR, and LIR, monitoring the work of the SHRR and LIR teams in-progress, monitoring Nuclear Oversight activities, attending review board meetings, and reviewing Condition Reports generated by the teams as reviews were conducted and discrepancies were identified. The inspectors also monitored training of reviewers, conducted walkdowns of selected systems, examined emergent issues, reviewed independent self-assessments of systems, and reviewed two SHRR reports. In addition, to assess the quality of your staff's reviews, the NRC conducted an in-depth design and performance capability review of the Service Water, High Pressure Injection, and 4160 Volt AC Electrical Distribution systems. The inspectors concluded that the System Health Assurance Plan was well-designed, plans and procedures were appropriate to the circumstances, the program was rigorously implemented, and quality assurance review by the Nuclear Oversight Department was adequate. Therefore, the staff concluded that the licensee had effectively implemented programs to identify and correct any deficiencies that may exist in the control and evaluation of surveillance testing, calibration, and post-maintenance testing.

**Reference Material** - Inspection Report Nos. 50-346/2002-013 and 50-346/2002-014 (ADAMS Accession No. ML030630314).

**RAM Item No.** - SUP-46

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Equipment Performance: Assess the operational performance of the selected safety system to verify its capability of performing the intended safety functions.

**Description of Resolution** - This assessment was done by the NRC as part of the SSDI. The SSDI was an in-depth design and performance capability review of the Service Water, High Pressure Injection, and 4160 Volt AC Electrical Distribution systems. The completion of the SSDI satisfied this supplemental inspection scope.

**Reference Material** - Inspection Report Nos. 50-346/2002-013 and 50-346/2002-014 (ADAMS Accession No. ML030630314).

**RAM Item No.** - SUP-47

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Equipment Performance: Review a sample of EP related equipment and facilities (including communications gear) against Plan commitments. Review the adequacy of the surveillance program to maintain equipment and facilities. Review the correction of deficiencies identified by the surveillance program.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. Based on acceptable licensee performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item. With the exception of the EPZ Alert and Notification (siren) System, the ROP places less emphasis on performing review of EP related facilities and equipment maintenance. However, aspects of reviews of records related to maintenance and surveillances of EP related equipment are addressed in Inspection Procedures 71114.02 ("Alert and Notifications System Testing"), 71114.03 ("Emergency Response Organization Augmentation"), and 71114.05 ("Correction of Emergency Preparedness Weaknesses and Deficiencies"). These Inspection Procedures provide the appropriate inspection guidance for this item and were accomplished during this ROP cycle and documented in Inspection Report 50-346/02-05.

**Reference Material** - Inspection Report No. 50-346/2002-005 (ADAMS Accession No. ML022060551).

**RAM Item No.** - SUP-51

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Configuration Control: Determine whether the primary and secondary chemistry control programs adequately control the quality of plant process water to ensure long-term integrity of the reactor coolant pressure boundary.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. No inspections beyond the baseline are intended for this item.

**RAM Item No.** - SUP-52

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Configuration Control: Assess the programs and controls (tracking systems) in place for maintaining knowledge of the configuration of the fission product barriers including: containment leakage monitoring and tracking, containment isolation device operability (valves, blank flanges), and reactor coolant leak-rate calculation and monitoring.

**Description of Resolution** - These areas were assessed as part of the NRC's inspections of the licensee's containment Integrated Leak Rate Test, and Normal Operating Pressure/Temperature test. Containment leakage was found to be well within allowable limits, and the licensee's program for monitoring and determining reactor coolant leakage was determined to be well implemented.

**Reference Material** - Inspection Report Nos. 50-346/2003-05 (ADAMS Accession No. ML032230339) and 50-346/2003-023, which is scheduled to be issued in December 2003.

**RAM Item No.** - SUP-54

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Emergency Response Organization Readiness: Assess the effectiveness of corrective actions for deficiencies involving ERO readiness.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. Based on acceptable licensee performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item. Inspection Procedures 71114.03 ("Emergency Response Organization Augmentation"), and 71114.05 ("Correction of Emergency Preparedness Weaknesses and Deficiencies") provide the appropriate inspection guidance for this item. These Inspection Procedures were accomplished during this ROP cycle and documented in Inspection Report 50-346/02-05.

**Reference Material** - Inspection Report No. 50-346/2002-005 (ADAMS Accession No. ML022060551).

**RAM Item No.** - SUP-55

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Emergency Response Organization Readiness: Verify that adequate staffing is available on shift for emergencies.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. Based on acceptable licensee performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item. Inspection Procedures 71114.03 ("Emergency Response Organization Augmentation"), and 71114.05 ("Correction of Emergency Preparedness Weaknesses and Deficiencies") provide the appropriate inspection guidance for this item. These Inspection Procedures were accomplished during this ROP cycle and documented in Inspection Report 50-346/02-05.

**Reference Material** - Inspection Report No. 50-346/2002-005 (ADAMS Accession No. ML022060551).

**RAM Item No.** - SUP-56

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Emergency Response Organization Readiness: Verify the capability to activate and staff the emergency response facilities and augment the response organization within the requirements of the licensee emergency response plan.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. Based on acceptable licensee performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item. Inspection Procedure 71114.03 ("Emergency Response Organization Augmentation") provides the appropriate inspection guidance for this item. This Inspection Procedure was accomplished during this ROP cycle and documented in Inspection Report 50-346/02-05.

**Reference Material** - Inspection Report No. 50-346/2002-005 (ADAMS Accession No. ML022060551).

**RAM Item No.** - SUP-57

**Closed:** Y

**Description of Issue** - Assessment of Performance in the Reactor Safety Strategic Performance Area: Key Attribute - Emergency Response Organization Readiness: Verify

licensee ability to meet Emergency Plan goals for activation by implementing Inspection Procedure 71114.03, "Emergency Response Organization Augmentation." If this inspection procedure has been implemented recently, the inspector may exercise judgement as to the need to implement the inspection procedure as part of the 95003 inspection effort. If Attachment 95003.01 is being implemented, there are additional requirements under this key attribute to consider.

**Description of Resolution** - Inspection Procedure (IP) 95003 states in the Inspection Guidance section that "...certain inspection guidance is only applicable if problems are identified in that area." The Resource Estimate for IP 95003 also states that "Not all areas will be performed during each inspection." Discussions with the author/owner of the procedure confirmed that the scope of the procedure is geared towards an operating plant, not a plant in the MC 0350 status. The intent of the procedure wording is to provide for flexibility in the planning of which inspection areas to focus on, not to mandate inspection activities for each line item suggested in IP 95003. Based on acceptable licensee performance in the Emergency Preparedness strategic area, no inspections beyond the baseline are intended for this item. The threshold or entry conditions for the performance of Attachment 95003.01 were not met; therefore, this attachment will not be performed for Davis-Besse. Inspection Procedure 71114.03 ("Emergency Response Organization Augmentation") provides the appropriate inspection guidance for this item. This Inspection Procedure was accomplished during this ROP cycle and documented in Inspection Report 50-346/02-05.

**Reference Material** - Inspection Report No. 50-346/2002-005 (ADAMS Accession No. ML022060551).

December 9, 2003

DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST			
Item Number	Action Item (Date generated)	Assigned to	Comments
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; 07/0-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; 10/14-Discussed, The inspection schedules and focus areas for post restart are incorporated in the punch list. When developed, the listing for 0350 Panel termination criteria will be presented to the Panel for approval; 11/20-Discussed; a listing for 0350 Panel termination should be added to the punch list then this item may be closed.
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; 10/14-Discussed, J. Shea is compiling the list of Q & As for review by the Panel and results will be forwarded to the RA; 10/21-Brainstorming session to occur 10/23 to final presentation to Panel; 11/20- The list of Q&As will be inserted to the Comm Matrix today.
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	10/14-Discussed, Information surrounding this issue will be collated and discussed at a future meeting; 11/04-Discussed, put in Nov Newsletter; 11/20-Need to verify that this was addressed in the November Monthly Update, then may close.

December 9, 2003

<b>DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST</b>			
<b>Item Number</b>	<b>Action Item (Date generated)</b>	<b>Assigned to</b>	<b>Comments</b>
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	10/14-Investigation is still ongoing.
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; 10/14-Discussed, This issue will be completed by licensee 10/15, and the results will be presented to the Panel within the next 2 weeks; 10/28-Mr. Jacobson will brief the Panel on 11/06, following final week at site, with results; 11/20- This may be closed upon issue of NOP report.
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	10/14-Discussed, Set of bullets still under development; item will be discussed at next Panel meeting on 10/16; 11/04 - Discussed, J. Stang will add this item to Comm. Matrix and send J. Grobe the draft set of bullets; 11/20-Only remaining item is the documented criteria for proof of reasonable confidence.
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. (10/02)	J. Lara	10/14-The TIA has been submitted to the Branch Chief for review; 10/21-The TIA is with A. Mendiola; 10/28-Held telephone conversation yesterday for obtaining information; 11/18-TIA is being revised to document the question to NRR in a formal manner so that NRR may document an answer in a formal manner if this is a safety concern.



December 9, 2003

<b>DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST</b>			
<b>Item Number</b>	<b>Action Item (Date generated)</b>	<b>Assigned to</b>	<b>Comments</b>
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. (10/09)	S. Thomas	10/14-Discussed, This review is ongoing and will be documented in Inspection Report 03-22.
219	Brief Jim Caldwell on how Immediate Action Maintenance issue was resolved. He would like to see the revised procedure. (10/21)	S. Thomas	10/28-Brief will include research information on Exelon approach; 11/20-NRC is reviewing a copy of the licensee's revised procedure.
220	Develop inspection plan requirements which include review of post restart security program effectiveness. (10/28)	D. Passehl	11/20-The plan is being developed and supplemented from baseline requirements.
221	Research use of a "Quick Look" letter which formalizes preliminary inspection results prior to final report being issued to address urgent Restart decision issues. (10/28)	D. Passehl	11/04-Discussed, suggestion was made to send an email to S. Collins for assistance; 11/20-Awaiting information from STP, and Millstone restart documents-will update the Panel at 11-25-03 meeting.
<b>224 (NEW ITEM)</b>	Rewrite the proposed IN on TSP to be generic and reflect attainable plant conditions and what information should be disseminated to the industry concerning Boric Acid Corrosion Control Programs. (12/09)	D. Hills	
<b>225 (NEW ITEM)</b>	Send out the newest revision of the Restart Comm Plan for Panel review. (12/09)	C. Lipa	12/09-Newest revision is in final and will be brought to Panel for review 12/12.

December 9, 2003

<b>DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST</b>			
<b>Item Number</b>	<b>Action Item (Date generated)</b>	<b>Assigned to</b>	<b>Comments</b>
<b>226 (NEW ITEM)</b>	Verify with Mel Fields that Greenpeace has received response to 2.206 and that there are no outstanding issues. (12/09)	A. Mendiola	