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To: Dyer, NRR.

AUTHOR: Tom Gurdziel

AFFILIATION: NY

ADDRESSEE: George Smart

SUBJECT: FirstEnergy annual report for 2003...Davis Besse restoration.....

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Chairman Nils J. Dize

FYI
Don Sundyie

9 Twin Orchard Drive
Oswego, NY 13126
August 17, 2004

George M. Smart
Chairman of the Board
FirstEnergy Corp.
76 South Main Street
Akron, OH 44308

Dear Mr. George M. Smart:

As I was reading on page 13 of the FirstEnergy Annual Report for 2003, it came to me that the material in the "Davis-Besse Restoration" section did not appear to be completely in accord with my understanding of the effort there.

In paragraph 1 it said:

"The purpose of the formal inspection process is to establish criteria for NRC oversight of the licensee's performance and to provide a record of the major regulatory and licensee actions taken, and technical issues resolved, leading to the NRC's approval of restart of the plant."

I would conclude from these words that a major responsibility of the NRC was to record history. More importantly, the formal inspection process mentioned caused to be formed a special, Davis-Besse-specific committee to oversee the efforts at the plant, not simply to establish criteria.

In paragraph 2 it said:

"We installed a state-of-the-art leak-detection system around the reactor, "

If the definition of "around the reactor" means surrounds the reactor, this is not true. What you did was install a state-of-the-art leak-detection system only at the bottom of the reactor and NOT in accordance with a typical installation drawing available even to the public on the Internet. (It calls for monitoring (tubing) loops at BOTH the reactor bottom and the top.)

In paragraph 2 it also said:

"We installed.....modified high-pressure injection pumps."

While this is literally true, it would be more complete to say: We installed high-pressure injection pumps that we modified so that they would now be operable under all accident conditions.

Also in paragraph 2 it said:

“Testing of the bottom of the reactor for leaks was completed in October 2003 and no indication of leakage was discovered.”

Again, literally true. However, the (lithium) test suggested by the NRC committee chairman was NOT done; the inspection was not done at full (or near full) operating pressure; and the intent was to test the entire reactor vessel, including the new, upper reactor head. Isn't it interesting that no comment was made of leak indications in these areas? (This would include the gaskets for the CRDMs, which, I believe, the NRC Lessons Learned report stated had leaked for as long as 10 years before being replaced in the past.)

On page 14, it said in paragraph 3:

“No additional capital expenditures related to the restoration are expected.”

I think I remember a promise to replace the presently installed reactor head with one of improved material. I also believe that a decent estimate of cost for it would be about 23 million dollars. Installation would be additional.

Are these present understandings of mine incorrect?

Thank you,

Tom Gurdziel