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FROM: Tom Gurdziel
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TO: Chairman Diaz

FOR SIGNATURE OF : ** GRN ** CRC NO: 04-0725

DESC: November 16, 2004 Meeting Slides - Perry

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EDO --G20040816

Chairman Nils J. Diaz

FYI

Tom Gurdziel *Tom Gurdziel*

From: Tom Gurdziel [tgurdzie@dreamscape.com]
Sent: Saturday, November 20, 2004 11:53 PM
To: opa3@nrc.gov
Cc: Rep. Marcy Kaptur; J. Mangels; J. Funk; Ed Stronski; David Lochbaum; opa1@nrc.gov; opa@nrc.gov
Subject: November 16, 2004 Meeting Slides

Good morning Jan,

Thank you for the slides. I wish somebody would have hired a stenographer so there would have been a transcript. Mainly, I don't understand how a method of uniform administration can be expected to be their salvation. In fact, if I recall it correctly, Jim Calhoun, coach of the University of Connecticut basketball team was interviewed yesterday or the day before during the Coaches Against Cancer basketball tournament in New York City. When asked how he treated his star players and those of lesser ability, he said that he did not treat them the same. He also said you would have to be a fool to treat them the same.

Well, isn't that what FirstEnergy is planning on doing? I think it is. And, I think I know why. If they have this "fleet approach" accepted by everybody, then they can do just enough for the best performer (right now that is either Davis-Besse or Beaver Valley), and claim they don't understand why it is not working at Perry. They (higher level management) will be able to evade responsibility for poor plant performance.

So, what I am saying is that, in my opinion, it is not the process that is their continuing problem, it is their people's level of technical knowledge and their inability or refusal to identify problems. (For example, Perry Inspection Report 2003006 (I think it is 6, describes on page 5 that plant staff were unable or unwilling to identify deficiencies with fire doors. Or, Perry Inspection Report 2004013 where it takes three pages (19 to 22) to explain how 12.4 GPM meets Tech. Spec requirements for a closed valve in the opinion of a licensed Perry Senior Reactor Operator.)

Let's get on to specific slide comments now.

Slide 13

When I see somebody telling me they are for adequate resources, I conclude they are not when they intend to prioritize them. And, have you really increased checks and balances if the head QA person is just a vice president and people he will deal with are of higher level? And, as I have just mentioned above, who is it that they think is going to detect early (or present) performance decline?

Slide 15

Is the Board of Directors on the Nuclear committee the same group of people who did not have their transmission lines trimmed on a regular 5 year interval, or who did not think that software for their load dispatchers had to be newer than 1998 when they caused the big blackout on August 14, 2003?

Slide 18

That "one corrective action process" may be the one described in Perry Inspection Report 2004008 on page 18 as ineffective. If so, that is not a present accomplishment/result.

When I see backlog, I think: inadequate number of people working.

Slide 19

Except that it delays action, why bother to benchmark "Engineering product quality" when you could read pages 7 & 10 of Perry Inspection Report 2004008? It describes a weakness in engineering knowledge. For Operations, note on page 15 of the same report that their

tagging system did not work.

Slide 28

In my opinion, Perry is not a safe plant and should be shut down immediately. My reasons include:

Perry Inspection Report 2003006 page 2 & 23 Shift manager did not follow emergency classification and action level scheme: page 1 Did not establish system goals for (a)(1) maintenance rule classification for 6 systems

Perry Inspection Report 2004002 page 15 procedure non-compliance on Feb 8 and Feb 11 after a stand down on procedure use

Perry Inspection Report 2004006 page (?) failed to establish procedures to periodically vent low pressure core spray & RHR "A"

Perry Inspection Report 2004009 page (?) untimely actual emergency declaration

Perry Inspection Report 2004008 page 20 at the time of inspection, inspectors were unable to review the Improvement Initiative Plan

Perry Inspection Report 2004013 page 28 - 31 repetitive failure to properly post protected areas

Un-numbered slide between slide 37 and slide 39

How frequently do they change the head of this function? Wasn't a woman assigned just a few months ago? What happened to her?

Slide 39

I would be happy if the "Use of outside expertise" was 100% of their staff for this function. In other words, contract it out.

Thank you,

Tom Gurdziel