



November 30, 2004

Mr. John A. Grobe, Chairman
Davis-Besse 0350 Panel
United States Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

SUBJECT: DAVIS-BESSE MID-CYCLE OUTAGE SCOPE

Dear Mr. Grobe:

The recent finding by the Nuclear Regulatory Commission that FirstEnergy failed to properly report the emergency siren performance indicator for Davis-Besse is among the ample evidence for continued regulatory oversight of this facility by your 0350 Panel.

FirstEnergy plans a mid-cycle outage at Davis-Besse in the near future. The NRC should take this opportunity to investigate whether adequate safety margins exist for the two reactor coolant pumps (RCPs) that FirstEnergy opted not to repair during the 2002-2004 outage. A year ago, FirstEnergy informed the NRC¹ that it had replaced the casing-to-cover gaskets on RCPs 1-1 and 1-2. FirstEnergy additionally reported that "*Results of that testing [September 2003] indicate that the case-to-cover gaskets [for RCPs 2-1 and 2-2] have performed as designed and indicate that they are nearing the end of their operational life.*" It would be very prudent and entirely consistent with an oft-asserted "safety first" approach for FirstEnergy to conduct testing and/or inspections of RCPs 2-1 and 2-2 to determine if the case-to-cover gaskets still have operational life remaining.

The mid-cycle outage would also provide an excellent opportunity for the NRC to assess the results from the Bentley-Nevada diagnostic equipment installed on all four RCPs during the 2002-2004 outage. Focused NRC attention to this area seems warranted given this NRC finding:

The team determined that the licensee's evaluations [of RCP case-to-cover gasket leakage] were based on testing that: (1) did not use the same methodology from outage to outage; (2) did not attempt to normalize the data from outage to outage; (3) did not consider the impact of reactor coolant pressure and temperature conditions on the test results; and (4) was only intended to verify that the leak detection lines were open and not blocked.²

The newly installed Bentley-Nevada diagnostic equipment provides data on pump performance. The NRC should evaluate how FirstEnergy has integrated this data with past data to verify, among other things, that FirstEnergy is not using the data simply to ensure the pump is running.

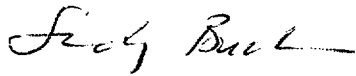
¹ Letter dated November 23, 2003, from Lew W. Myers, Chief Operating Officer, FirstEnergy Nuclear Operating Company, to Nuclear Regulatory Commission, "Integrated Report to Support Restart of the Davis-Besse Nuclear Power Station and Request for Restart Approval," page 66.

² Letter dated March 5, 2004, from John A. Grobe, Nuclear Regulatory Commission, to Lew W. Myers, FirstEnergy Nuclear Operating Company, "Davis-Besse Nuclear Power Station NRC Special Team Inspection – Corrective Action Program Implementation – Rreport 05000346/2003010(DRS) and Notice of Violation," page 74.

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We would respectfully request that the NRC outline its planned inspection activities related to the reactor coolant pumps during the mid-cycle operation at the next 0350 panel meeting, which we believe is scheduled for December 6, 2004. We expect that the results from these NRC inspection efforts will be recorded in future inspection report(s).

Sincerely,



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