March 23, 2005

Ms. Sandy Buchanan
Executive Director
Ohio Citizen Action
614 W. Superior Avenue, Suite 1200
Cleveland, Ohio 44113

SUBJECT: DAVIS-BESSE MID-CYCLE OUTAGE SCOPE

Dear Ms. Buchanan:

This is in response to your letter to Mr. John Grobe dated November 30, 2004, that discussed a concern with performance of the casing-to-cover gaskets for the reactor coolant pumps. Specifically, you stated that the NRC should investigate whether adequate safety margin exists for the two reactor coolant pumps (RCPs) that FirstEnergy did not repair during the 2002-2004 outage and that the mid-cycle outage would provide an opportunity for the NRC to assess the results of diagnostic monitoring the licensee performed on all four pumps during the current cycle.

With respect to your first concern, the significance of previous casing-to-cover gasket leakage was assessed. As documented in Section 4OA3(3)b.20 of Inspection Report 05000346/2003010, the NRC inspectors identified that the licensee failed to adequately analyze previous results of an apparent continuing leak past the inner gasket on the RCPs. Specifically, minor leakage past the inner gasket was noted on all four pumps during previous outages and the documented evaluation did not address why it was acceptable to not repair the gaskets. The inspectors determined that the inner gaskets did not represent pressure boundary leakage and that leakage past the outer gasket would be categorized as either identified or unidentified reactor coolant leakage, and would be subject to Technical Specification limits. Leakage past the inner gasket was not considered to be a safety concern. We do not intend to re-analyze the significance of this issue at this time.

With respect to your second concern, during the extended outage in 2002-2004, the licensee installed diagnostic equipment on the RCPs; however, this equipment was intended to monitor vibration; not leakage across the gaskets. We do not plan to review the diagnostic monitoring results at this time. However, during the mid-cycle outage in January 2005, the licensee performed a visual inspection of the RCP 2-1 and 2-2 pumps, which are the pumps with the old gasket material. The licensee had established criteria for the inspections and had planned to refurbish both pumps if warranted. The NRC inspectors observed the licensee's visual inspection and noted a small amount of boric acid deposit on the RCP 2-2 case to cover joint. The boric acid was dry, white, and tightly adhered to the joint. The deposit did not contact the case to cover studs which are part of the pressure boundary. The inspectors verified that the licensee entered the condition into their corrective action program. The inspectors also noted a similar amount of boric acid deposits on the RCP 2-1 case to cover joint; however, again, this did not represent pressure boundary leakage. The NRC inspectors will continue to monitor the licensee's activities.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Should you have any questions regarding this issue, please contact Ann Marie Stone at (630) 829-9729.

Sincerely,

/RA/

Steven A. Reynolds, Chairman
Davis-Besse Oversight Panel

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