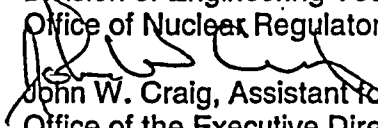




UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

October 2, 2001

MEMORANDUM TO: Nilesh Chokshi, Chief  
Materials Engineering Branch  
Division of Engineering Technology  
Office of Nuclear Regulatory Research

FROM:   
John W. Craig, Assistant for Operations  
Office of the Executive Director for Operations

SUBJECT: "COOK CONTAINMENT WALLS"

On September 17, 2001, the EDO received an e-mail from Ross Landsman. Mr. Landsman provided comments regarding the subject issue. As Chairman of the Ad Hoc DPO Panel Concerning the Startup of D.C. Cook, Units 1 and 2, you carefully reviewed the subject issues and provided the Panel's assessment, conclusions and recommendations in the DPO Panel Report dated March 2, 2001. I therefore request that you review the technical information in Mr. Landsman's e-mail which is quoted below to determine if it contains significant new information not previously considered. Please provide your assessment to me by October 22, 2001. To bring you up-to-date on post-DPO Panel Report activities, I have attached the June 25, 2001 memorandum from NRR in which they present the results of their follow-up review of the DPO Panel Report's recommendations.

Quote:

"In an attachment to your April 2, 2001, memorandum to me regarding the resolution of the Cook containment walls differing professional opinion (DPO), you requested NRR address the issues identified by the DPO panel in Section 2.1.2 of their report. Specifically, that the NRR staff did not document, in our summary of the June 1, 2000, Unit 2 meeting, that the reviewer and I, and the rest of the staff did not agree with the licensee's method of analysis or their assumptions. At that time, I was concerned that the licensee would sharpen their pencils, get the walls to appear to be ok (get the interaction coefficients more than 1.5), even though we did not agree with their analysis methods and assumptions, and the issue would fall in the cracks unless I did something. That concern generated my differing professional view (DPV). Subsequent to the DPV, the licensee continued to use the same methods and assumptions that we did not accept. That's what generated the DPO. In fact, the DPO report acknowledges the licensee continues to use the same methods that the staff did not accept for Unit 2, for its Unit 1 assessments (Ref. 17 and 18 in the DPO Report).

The licensee is probably still using unacceptable methods and assumptions.

After the DPO report was issued, a final Unit 1&2 meeting was held on June 11, 2001. It should be noted, that neither the original Unit 2 reviewer nor I, who knew what the real structural issues were, were invited. In the summary of that

8

meeting, the staff failed to document their basis for accepting the licensee's analysis although the DPO report recommended that the staff's basis for acceptance be clearly documented.

In early meetings on this issue, specific information on actual stresses was provided, could be evaluated, and the flaws in the licensee's results exposed. The NRR staff, as well as the licensee, recognized this and did not include any actual numbers (stresses, factor's of safety, interaction coefficients, etc.) in either the NRC summary of the June 11, 2001, meeting or the licensee's associated handouts. As a result, no one could question the real status of the containment walls; the only information presented was that the licensee "indicated that all calculations had been completed and all structures have adequate margin and comply with the design basis requirements stated in the FSAR." Did the licensee use yield line theory analysis, a dynamic increase factor, increased reinforcing steel strength without supporting data, better yet, did they meet the design basis interaction coefficients of 1.5? All these were the issues with which the NRC disagreed during the June 1, 2000, meeting, but were never documented. One still cannot tell from the June 11, 2001, meeting summary what specific methods and assumptions the licensee used nor what the NRR staff reviewed (if anything).

In summary, I believe the CEQ fan room walls are still unacceptable and do not meet our requirements. Therefore, the Cook containments will not protect the health and safety of the general public from the design basis accident!"

I appreciate your prompt attention and review of this matter. If you have any questions, please contact me at 415-1703.

Attachment:  
As stated



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

MEMORANDUM TO: Nilesh Chokshi, Chief  
Materials Engineering Branch  
Division of Engineering Technology  
Office of Nuclear Regulatory Research

FROM: John W. Craig, Assistant for Operations  
Office of the Executive Director for Operations

SUBJECT: "COOK CONTAINMENT WALLS"

On September 17, 2001, the EDO received an e-mail from Ross Landsman. Mr. Landsman provided comments regarding the subject issue. As Chairman of the Ad Hoc DPO Panel Concerning the Startup of D.C. Cook, Units 1 and 2, you carefully reviewed the subject issues and provided the Panel's assessment, conclusions and recommendations in the DPO Panel Report dated March 2, 2001. I therefore request that you review the technical information in Mr. Landsman's e-mail below to determine if it contains significant new information not previously considered. Please provide your assessment to me by October 22, 2001. To bring you up-to-date on post-DPO Panel Report activities, I have attached the June 25, 2001 memorandum from NRR in which they present the results of their follow-up review of the DPO Panel Report's recommendations.

attached:

"In an attachment to your April 2, 2001, memorandum to me regarding the resolution of the Cook containment walls differing professional opinion (DPO), you requested NRR address the issues identified by the DPO panel in Section 2.1.2 of their report. Specifically, that the NRR staff did not document, in our summary of the June 1, 2000, Unit 2 meeting, that the reviewer and I, and the rest of the staff did not agree with the licensee's method of analysis or their assumptions. At that time, I was concerned that the licensee would sharpen their pencils, get the walls to appear to be ok (get the interaction coefficients more than 1.5), even though we did not agree with their analysis methods and assumptions, and the issue would fall in the cracks unless I did something. That concern generated my differing professional view (DPV). Subsequent to the DPV, the licensee continued to use the same methods and assumptions that we did not accept. That's what generated the DPO. In fact, the DPO report acknowledges the licensee continues to use the same methods that the staff did not accept for Unit 2, for its Unit 1 assessments (Ref. 17 and 18 in the DPO Report).

The licensee is probably still using unacceptable methods and assumptions.

After the DPO report was issued, a final Unit 1&2 meeting was held on June 11, 2001. It should be noted, that neither the original Unit 2 reviewer nor I, who knew what the real structural issues were, were invited. In the summary of that meeting, the staff failed to document their basis for accepting the licensee's analysis although the DPO report recommended that the staff's basis for acceptance be clearly documented.

stick  
is  
attached  
below

In early meetings on this issue, specific information on actual stresses was provided, could be evaluated, and the flaws in the licensee's results exposed. The NRR staff, as well as the licensee, recognized this and did not include any actual numbers (stresses, factor's of safety, interaction coefficients, etc.) in either the NRC summary of the June 11, 2001, meeting or the licensee's associated handouts. As a result, no one could question the real status of the containment walls; the only information presented was that the licensee "indicated that all calculations had been completed and all structures have adequate margin and comply with the design basis requirements stated in the FSAR." Did the licensee use yield line theory analysis, a dynamic increase factor, increased reinforcing steel strength without supporting data, better yet, did they meet the design basis interaction coefficients of 1.5? All these were the issues with which the NRC disagreed during the June 1, 2000, meeting, but were never documented. One still cannot tell from the June 11, 2001, meeting summary what specific methods and assumptions the licensee used nor what the NRR staff reviewed (if anything).

In summary, I believe the CEQ fan room walls are still unacceptable and do not meet our requirements. Therefore, the Cook containments will not protect the health and safety of the general public from the design basis accident!"

Attachment:

As stated

I appreciate your prompt attention and review  
of this matter.  
If you have any questions  
please contact us at 415 1703

meeting, the staff failed to document their basis for accepting the licensee's analysis although the DPO report recommended that the staff's basis for acceptance be clearly documented.

In early meetings on this issue, specific information on actual stresses was provided, could be evaluated, and the flaws in the licensee's results exposed. The NRR staff, as well as the licensee, recognized this and did not include any actual numbers (stresses, factor's of safety, interaction coefficients, etc.) in either the NRC summary of the June 11, 2001, meeting or the licensee's associated handouts. As a result, no one could question the real status of the containment walls; the only information presented was that the licensee "indicated that all calculations had been completed and all structures have adequate margin and comply with the design basis requirements stated in the FSAR." Did the licensee use yield line theory analysis, a dynamic increase factor, increased reinforcing steel strength without supporting data, better yet, did they meet the design basis interaction coefficients of 1.5? All these were the issues with which the NRC disagreed during the June 1, 2000, meeting, but were never documented. One still cannot tell from the June 11, 2001, meeting summary what specific methods and assumptions the licensee used nor what the NRR staff reviewed (if anything).

In summary, I believe the CEQ fan room walls are still unacceptable and do not meet our requirements. Therefore, the Cook containments will not protect the health and safety of the general public from the design basis accident!"

I appreciate your prompt attention and review of this matter. If you have any questions, please contact me at 415-1703.

Attachment:  
As stated

Distribution:

EDO R/F  
AO R/F  
WTravers  
CPaperiello  
WKane  
PNorry  
JCraig  
ISchoenfeld  
JDyer, RIII

G:\AO\DPO-CookChokshi-IS.wpd

\*See previous concurrence

OEDO\*  
ISchoenfeld:paa  
10/02/01

AO/OEDO  
JWCraig  
10/10/01

In early meetings on this issue, specific information on actual stresses was provided, could be evaluated, and the flaws in the licensee's results exposed. The NRR staff, as well as the licensee, recognized this and did not include any actual numbers (stresses, factor's of safety, interaction coefficients, etc.) in either the NRC summary of the June 11, 2001, meeting or the licensee's associated handouts. As a result, no one could question the real status of the containment walls; the only information presented was that the licensee "indicated that all calculations had been completed and all structures have adequate margin and comply with the design basis requirements stated in the FSAR." Did the licensee use yield line theory analysis, a dynamic increase factor, increased reinforcing steel strength without supporting data, better yet, did they meet the design basis interaction coefficients of 1.5? All these were the issues with which the NRC disagreed during the June 1, 2000, meeting, but were never documented. One still cannot tell from the June 11, 2001, meeting summary what specific methods and assumptions the licensee used nor what the NRR staff reviewed (if anything).

In summary, I believe the CEQ fan room walls are still unacceptable and do not meet our requirements. Therefore, the Cook containments will not protect the health and safety of the general public from the design basis accident!"

Attachment:  
As stated

Distribution:

EDO R/F  
AO R/F  
WTravers  
CPaperiello  
WKane  
PNorry  
JCraig  
ISchoenfeld

G:\AO\DPO-CookChokshi-IS.wpd

OEDO  
ISchoenfeld:paa  
10/2/01

AO OEDO  
JWCraig  
10/2/01