

9 Twin Orchard Drive
Oswego, NY 13126
August 17, 2005

James L. Caldwell
Regional Administrator
USNRC Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Dear Mr. James L. Caldwell:

I have these observations from my reading of ADAMS document ML052210512.

Paragraph 3, first page

It is interesting that performance is described as declining rather than poor or low. This implies that their performance had been better some time in the past. (It might be helpful to have that time period(s) identified.)

Paragraph 5, first page

While they may have "invested significant resources" upgrading the design of the emergency service water pump COUPLINGS presently in use, I am still wondering if they have up to date vendor manuals for these pumps and follow their advice. Specifically, do the current vendor manuals suggest starting the pumps with a closed discharge valve and not using them to provide flow until the pumps are vented? Also, do current vendor manuals allow or require a vacuum breaker type valve on the pumps to allow air to enter the pumps each time they stop?

Also, "refurbishing a significant population of electrical circuit breakers" seems to be missing the part where they tell the reader that the vendor manual recommended that these circuit breakers be serviced at 10 years, (which was not done then), and that the number involved was approximately 60 to 70. I expect that at least some were supposed to be covered by the Maintenance Rule: this is not mentioned either.

Attachment 1, page 1 of 3, paragraph 1

I was at my daughter's house (near King of Prussia in Pennsylvania) this past weekend with the very clear expectation that I would trim some dead wood from trees in her yard. However, before I finished using the chainsaw, it quit working and I couldn't get it restarted. The conclusion would be that, no matter how clear are the "existing expectations", results could be poor or even non-existent without the necessary performance of both workers and machinery. (In my case, I got two trees trimmed, but not the third. This was a disappointment to me.)

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In the case at hand, (Perry), I feel the "lack of reinforcing existing expectations by management and supervision" is insignificant and not a "key factor".

Attachment 1, page 1 of 3, paragraph 3

The statement: "the Phase 2 PII addresses the crosscutting issues of problem identification and resolution and human performance" appears to be incorrect. I can't identify anywhere in either Corrective Action Program Implementation Improvement or Excellence in Human Performance where any attention is given to finding problems. Attention is given to handling a problem only AFTER it has been identified.

This is Letter 4. I need no reply.

Thank you,

Tom Gurdziel

Copy: D. Lochbaum

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