

From: <qpif@aol.com>
To: <gfd@nrc.gov>
Date: 8/14/05 8:52PM
Subject: Comments on Proposed Director's Decision

August 14, 2005

Mr. Dick,

I have the following comments on the Proposed Director's Decision:

The proposed DD states that the licensee has made a commitment to develop a plan for the LSIV and placed the commitment in the Corrective Action Program. This is not true. The items for the Corrective Action program are tracked in the Action Tracking Module of Passport. This module is also used to track non-Corrective Action Program items. Per the CAP procedure, actions from IRs are to be coded as CA or ACIT. The item to develop the plan is coded as MREQ (Management Request) and is therefore not in the Corrective Action Program. This is significant since items coded as MREQs can be closed out with no review and they receive no oversight from the CAP. Additionally, the item is not coded as a commitment to the NRC.

Regarding the impact of loose parts on the pressurizer spray line, the licensee takes credit for a section of the UFSAR for the capability to cooldown and depressurize the RCS without normal spray. This capability relies on the use of the PZR PORVs and the ability to bleed and feed the Pressurizer Relief Tank. Currently the ability to fill the PRT with cool water is degraded as described in IRs 314770 and 357944, the corrective actions for this issue are due on October 2006. Difficulties in filling and draining the Unit 1 PRT formed the basis of an allegation in 2000 or 2001. Therefore the licensee's argument is rendered invalid by a longstanding equipment problem.

The proposed DD states that 'a key issue is whether the valve blocks are still in position in 1RC8002C'. NRC acknowledges the licensee's failure to inspect the valve blocks but then gives inappropriate credit for the inspection of the reactor vessel. Based on the absence of the valve blocks in the reactor vessel the NRC appears to conclude the valve blocks are still properly installed. Note that the material lost from the 1RC8002A over 6 years ago was approximately the same general weight and dimensions as the valve blocks. Since this material has never been found, it counters the assumption that if the valve blocks had dislodged that they would be in the vessel. Additionally, the time when the valve blocks are subjected to the most stress is when the valve is being closed. Since the RCP is off at this point, there is no flow to transport it to the vessel. Based on these facts, there is no remaining rationale to support what the NRC states is a key issue.

NRC also applies a risk based argument that it is unlikely that a large loose part would be generated coincident with a large break LOCA. Given the weakness in the argument that the valve blocks are intact (because they weren't found in the vessel), the concern remains that the dynamic forces of a LOCA could propel the debris towards the core barrel.

On the last page of the proposed DD, the NRC states that the licensee has a loose parts monitoring and retrieval system; this is incorrect as there is no retrieval system for loose parts.

Respectfully,
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