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CORRESPONDENCE CONTROL TICKET

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ACTION OFFICE: EDO

To: Dyer, NRR

AUTHOR: Tom Gurdziel

cus: EDO  
DEDMMS  
DEDR  
DEDIA  
AO

AFFILIATION: NY

ADDRESSEE: Mr. Luis Reyes

SUBJECT: Concerns the estimated time it may take for 7 inches of PWR upper head steel to dissolve

ACTION: Appropriate

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Chairman Dale E. Klein,

FYI

Jim Sundzie

1136

9 Twin Orchard Drive  
Oswego, NY 13126  
May 22, 2007

Mr. Luis A. Reyes  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. Luis A. Reyes:

The purpose of this letter is to suggest to you a path of lower risk. Recently there has come to the public's knowledge a startling new estimate of the time it may take for 7 inches of PWR upper head steel to dissolve. Using a "The Plain Dealer" May 15, 2007 article by Patrick O'Donnell, that time is about 4 months.

When I was on "C" Shift, (a US commercial nuclear plant operating crew), we told our operators to believe their instruments. Just because you are seeing something you are not used to seeing, or don't want to see doesn't mean you can safely ignore it. You would need to prove that instrument wrong before disregarding it.

Well, that's pretty simple, isn't it? And I think it is a relatively low risk path to follow. I mention it because I believe it is NOT the path the NRC is presently following with the Exponent reports. They present information the industry, or, in my opinion, the NRC, does not want to believe.

What the NRC appears to be doing is to allowing time to pass while asking the people whose explanations they find suspect to provide more explanations. Considering the especially short period of time in question, I consider this a very high risk path.

Here is what I suggest as a lower risk path. Since, as I understand it, the quick failure requires some conditions from the original Davis-Besse root cause AND an additional, hard to identify flaw that allows the erosion/dissolving to speed up, and since this can happen in 4 months, I would think that asking all PWR owners with Alloy 600 steel upper reactor heads to inspect on a 4 month interval is prudent if they cannot prove that they have none of those hard to detect flaws.

As you can see, what I am suggesting is that you consider the report as accurate until you or the industry proves it is not.

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CHAIRMAN REC'D

Perhaps though, you are seeing some proof already. If the report is accurate, wouldn't it be plausible to expect that FirstEnergy would have already made plans to extend the FLUS system from the present Davis-Besse reactor vessel cylinder and lower head to include the upper head as well? (I believe that their (present) reactor upper head #2 is made of the same material as was their reactor upper head #1.)

I don't need a reply.

Thank you,

Tom Gurdziel