

To: Dyer, NRR

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R111

9 Twin Orchard Drive
Oswego, NY 13126
May 28, 2007

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

Dear Mr. Luis A. Reyes:

In the spring of 2002, I wrapped up my Nine Mile observations/efforts and started following Davis-Besse. (About 2 years earlier I had brought to the attention of the new owner, Constellation Energy, approximately 32 different items that I had hoped were taken care of by then. To my surprise and to their credit, Constellation Energy obtained the services of 2 extremely nuclear-plant competent lawyers to talk with me and my friend Ed.) With the Nine Mile observations closed out, I read everything I could on the Davis-Besse situation.

As a result, I believe I am quite familiar with what happened from the time of the CRDM nozzle angular displacement to just before the end of the 0350 Committee. Might I point out a few things?

Item 1

I believe that your organization today has too much confidence that problems will be discovered while they are still small. In 2001, only a few NRC staff people felt that the Davis-Besse plant needed to be shut down at the end of the year, and their advice was not followed. At this same time:

- 1) containment (air?) sampling filters clogged up quickly
- 2) one containment sampling location was changed to give a more favorable (lower) reading
- 3) boric acid/steel residue was building up to the point where, later, the amount in the plenum alone filled 15 – 5 gallon containers
- 4) a complete hole existed in, I believe, the same ventilation ductwork

Despite all these indications, no industry person identified a big problem and successfully acted on it. There were a lot of organizations who should have acted. For instance: FirstEnergy site Operations department, FirstEnergy site Engineering department, FirstEnergy site QC organization, FirstEnergy site QA organization, FirstEnergy site operations type review committee, FirstEnergy site Safety Review and Audit type

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committee, FirstEnergy corporate QA organization, FirstEnergy corporate Engineering organization, FirstEnergy corporate nuclear-plant-knowledgeable management, peer utilities aware of the problem, and INPO on their plant assistance visits. (Would you say that would be over 200?)

Isn't that an awful lot of people who have demonstrated that they could not identify a nuclear safety problem? In fact, add FirstEnergy ISI because the way the problem was actually found was by sloppy rigging. When lifting a repair machine out of a CRDM nozzle, they did not lift vertically and this is what led to discovery of one head cavity when the nozzle tipped from vertical! (I still don't know if the repair, up to that point, had been considered a success.)

Item 2

The very sensitive FLUS system was NOT installed to monitor the replacement head. (It goes other places, but not up there.) The replacement head is made of the same material as the failed head.

Item 3

Changing leaking CRDM gaskets might have been scheduled for as long as 10 years later.

Item 4

Enlarging the "mouse holes" was delayed, then delayed, then cancelled.

Item 5

The ooze flowing through the mouse holes was not taken as an indicator of trouble.

Item 6

When proposing to look for leaks with the new reactor head installed, FirstEnergy first proposed to do this AFTER the reactor pressure was removed.

Item 7

FirstEnergy promised to buy even another reactor head of better material. It has not yet been delivered to their plant, as far as I know.

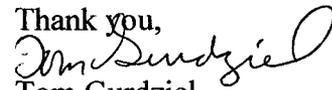
Item 8

Recommendation 3.3.4(8) of the Davis-Besse Lessons Learned study was to either get ASME to change their code or change 10CFR50.55a to specify that insulation be removed when looking for leaks. If you look at the latest NRC web page status of this

item, as of August 31, 2005, it is not yet marked complete. Is a "lesson" actually learned if, years later, corrective action STILL HAS NOT BEEN TAKEN?

I have one suggestion: consider requiring the installation of a FLUS type system on the reactor heads of all susceptible plants. This would provide the advantage of identifying all leaks there when they occur, even if they were not anticipated.

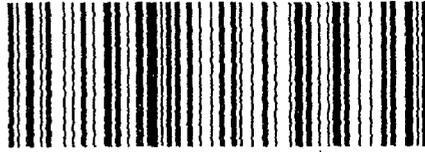
Thank you,



Tom Gurdziel

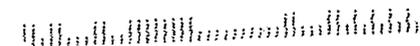
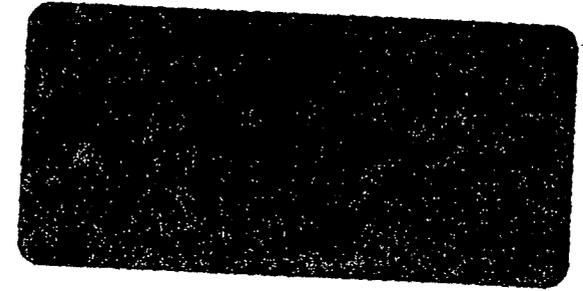
Thomas Gurdziel
9 Twin Orchard Drive
Oswego, New York 13126

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.
CERTIFIED MAIL



7006 2760 0005 3961 2745

Mr. Luis A. Reyes
Executive Director for Operations
USNRC
Washington, DC
20555-0001



NRC FORM 253 (9-96)		U.S. NUCLEAR REGULATORY COMMISSION		DATE OF REQUEST 6-13-07	CONTROL NUMBER
MESSENGER/COURIER RECEIPT					
TO: LUIS A. REYES, EXEC. DIR.		OFFICE EDO	BUILDING OWFN	ROOM NUMBER 17H1/16E1	
FROM: THOMAS GURDZIEL		OFFICE ADM	BUILDING OWFN	ROOM NUMBER P137	
DESCRIPTION 7006 2760 0005 3961 2745		MESSENGER/COURIER SIGNATURE			
		MESSENGER/COURIER 		DATE RECEIVED 6-12-07	
				TIME RECEIVED 4:00p	
		MESSENGER/COURIER		DATE RECEIVED	
				TIME RECEIVED	
		RECIPIENT'S SIGNATURE			
		RECIPIENT 		DATE RECEIVED 6/13/07	
				TIME RECEIVED 8:30am	
SENDER:		MESSENGER/COURIER:		RECIPIENT:	
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