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Date:	Tue, Jun 26, 2007 8:24 AM
Subject:	Fw: Revised slides

Attached is the presentation for tomorrow

(See attached file: FENOC DFI Response Public Meeting No Background.ppt)

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Joe Hagan FENOC President & Chief Nuclear Officer

#### Introduction & Agenda

- Joe Hagan
   Opening Remarks
- Gary Leidich
- FirstEnergy Senior Vice President Operations – FirstEnergy Perspective
- Greg Halnon
   Director Fleet Regulatory Affairs
   Insurance Claim Timeline & Process
- Insurance Claim Timeline & Process
   Dan Pace
- Dan Face
   Senior Vice President Fleet Engineering
   Exponent & Mattson Report Analysis
- Joe Hagan
  - Commitments & Concluding Remarks

# FENOC is Committed to Safety

- Lessons learned from the Davis-Besse event will not be forgotten
- Strongly committed to operating all nuclear facilities safely and responsibly
   Annual Safety Culture and Safety Conscious Work
  - Annual Safety Culture and Safety Conscious Work Environment (SCWE) survey scores remain strong
     World class fleet industrial safety performance in 2006
  - Excellence Plans drive continued performance improvement

#### Plant Operations Reflect Safety Commitment

- Conservative operations lead to strong operating performance
- Equipment improvements ensure continued safe, reliable operations
- Industry recognizes performance improvements



- FENOC accepts full responsibility for the Davis-Besse event
- Root causes and corrective actions remain valid
- Expert reports do not impact safe and reliable operation of Davis-Besse or other nuclear plants
- Lessons learned are:
- Formal Reviews
   Early Communications





FirstEnergy Senior Vice President - Operations

#### Corporate Commitment to Nuclear Safety is Strong

- Nuclear safety is at the forefront
- Corporate confidence in FENOC with full authority to operate facilities safely and reliably
- Interfaces across corporate organizations need to improve
- Emphasis on safety is the highest priority at all levels of FirstEnergy





# FENOC Considers Exponent Report

- Commercial and nuclear processes did not sufficiently interface
- Determined no safety or inspection concern existed
- Lacked sensitivity to regulatory interest
- Improved process being developed



# FENOC Addresses May 2 Response Response was: Narrowly focused on crack and cavity development Not an endorsement of the entire Exponent Report Response did not sufficiently consider: Exponent's overall conclusions and assumptions

Operational data

NRC DFI Public Meeting June 27, 2007



Dan Pace Senior Vice President, Fleet Engineering

#### FENOC Stands by Root Cause Reports

- Analyses of root causes:
  - Provided comprehensive review of the Davis-Besse event
  - Identified programmatic failures
    - Not implementing boric acid corrosion control program properly caused head degradation
       Leakage detectable prior to 12RFO (2000)
  - Generated comprehensive and appropriate corrective actions



#### Exponent & Mattson Reports Were Not Root Causes

- Reflect expert testimony obtained for insurance claim process
- Exponent Report
  - Evaluated timing and evolution of wastage development based on recent data
  - Assessed ability to detect leakage in 12RFO (2000)
- Mattson Report

 Provided expert testimony on bonc acid control program



# FENOC Performed Analysis of Exponent Report

- Key root cause team members participated in review
- Exponent Report statements evaluated against technical/ managerial root cause reports
  - Impact on other root cause reports assessed
  - Key differences highlighted
  - Discussed findings with Exponent Team
  - Corrective actions reaffirmed

## FENOC Assessed Report Conclusions

- Exponent provided complex analysis of cracking/wastage on head
  - BWXT Head Report
  - Argonne National Laboratories Report
  - Recent Boric Acid Corrosion Data
- Root causes based on observed operational data
- Exponent results do not fully explain observed operational data

# Differences in Exponent Report and Root Cause Reports Noted

- Root cause reports conclude detectable leakage started prior to 2000
- Exponent analysis indicated
   degradation not detectable in 2000
- FENOC stands by analyses of root causes

## Mattson Report is Expert Testimony

- Contains expert testimony about the industry and its boric acid control programs
- Some of Mattson's conclusions can not be endorsed
- Agree with basic premise that damage to the reactor head was not deliberate
- Endorsed conclusions do not conflict with:
   Root cause reports
  - Licensee Event Report regarding the Reactor Pressure Vessel
  - FENOC's response to Notice of Violation and Proposed Imposition of Civil Penalties



#### **Report Conclusions Summarized**

- FENOC stands by analyses of root causes
- Reports represent expert opinion
- Exponent Report provides detailed technical analysis
- FENOC disagrees with Exponent regarding when leakage was detectable
- FENOC agrees damage to the reactor head was not deliberate



# **FENOC Commits to Actions**

- Develop process to review reports prepared for commercial matters
- Provide Operational Experience to industry
- Improve NRC correspondence procedure
- Assess Regulatory Communications policy
- Develop lessons learned from May 2 response





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