

25

Poehler, Jeffrey

From: Kirk, Mark
 Sent: Thursday, October 04, 2012 12:41 PM
 To: Fairbanks, Carolyn
 Cc: Hardies, Robert; Stevens, Gary; Poehler, Jeffrey; Nove, Carol; Csontos, Aladar
 Subject: Doel Q and A's

Dear Carolyn -

Thank you for providing us with a paper copy at the meeting yesterday. I am curious as to the purpose of these ... are they to go onto the website or into a press release?

I have had occasion to read them. I think they are generally very good and thorough. Also, I offer for your consideration the following comments:

1. In my opinion the answer to the question "do any plants in the US have similar inspection results" is not responsive to the question as posed. The answer says what we do now, but fails to directly answer the question posed. The answer is of course "no" and the reason is "because neither the NRC nor ASME requires it".

2. Similarly the answer to the question "were US reactor vessels inspected and tested prior to operation" is, in my opinion, not responsive to the question as posed. The answer says nothing about either inspection or testing.

3. I think that the answer to the question "in light of the Doel 3 inspection results, are US plants safe to operate" could be improved as follows:

A. I think the 1st sentence should say that the NRC is in the process of making this determination.

B. At the end of the response it says that "multiple laminar indications do not present a challenge to safe reactor vessel operation.". So that we are not seen to be presuming an outcome before all of the evidence is available I suggest removing the words "do not" and replacing them with the words "are not currently thought to."

C. In this answer it says that "the NRC intends to review modern analytical computer simulations of multiple laminar indications in forgings.". I fully agree that this is what we hope to happen, but at this stage we do not know if we will review or perform such analysis. Also, at this stage we do not know exactly what form such analysis will take. Given these unknowns I think it is better to be vague, perhaps saying instead that "the NRC intends to review and/or perform a structural safety assessment of indications of the type found in Doel on the presumption that they might exist in some US plants".

Best regards,

Mark

Mark Kirk, (b)(8) Cell (b)(6)

C/99