

9 Twin Orchard Drive  
Oswego, NY 13126  
February 19, 2016

Executive Director for Operations Victor M. McCree  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Executive Director for Operation Victor M. McCree:

Based on my reading of the most recent FirstEnergy/Davis-Besse event report, (Event Number 51696), I have come to the disappointing conclusion that the Davis-Besse site organization is back to their 2001 performance level. That means that I think they are, again, unaware of current plant conditions.

Back in maybe 2000, and certainly in 2001, the first Davis-Besse upper reactor head was being attacked by liquid boric acid. Since almost everybody knew that boric acid dripping from PWR control rod drive mechanisms above the head more or less fried into harmless, white, popcorn-like kernels when they touched the upper head, this was not a concern to most. But the upper head condition was a concern to NRC Staff at that time. They had, somehow, concluded that urgent action was needed (by the end of 2001), (and they were right), and recommended such to the NRC Commissioners at that time. The recommended urgent action was not taken by the NRC Commission, although they did take some action: namely, the outage was moved up a month or so.

Well, the outage began. Trouble was not found yet, though, since a visual inspection of the head was only required to be done on those surfaces visible without removing installed insulation on the head. (I believe this insulation usually is called "lagging"). Here is how they discovered they had a problem with their upper head. They were removing a control rod drive mechanism by lifting it up with a crane. They weren't lifting it straight up, as they should have been, they were pulling it to the side as well and the part that was supposed to be solidly fastened to the head tilted. It was only apparent then that a problem existed.

Then followed a long term effort by the NRC to get the plant straightened out. Jack Grobe, Christine Lipa, Scott Thomas, among many others, were fully committed to this effort. And, if memory serves me right, after Davis-Besse was better, the FirstEnergy/Perry plant got some attention as well. (For some reason, the FirstEnergy/Beaver Valley plant performances, in this time period, continued at a high level, somehow separate from the Davis-Besse influence, in my opinion.)

So that's a little of the FirstEnergy/Davis-Besse history. Presently, they were accepting a ½ scram AND continuing to do nuclear instrument calibration. Although, as I understand it, compliant with their Technical Specifications, this is non-conservative and I find it unacceptable. In fact, it is my opinion, (lacking the production of the actual blown fuse), that they caused the full scram themselves when completing the channel calibration.

I am requesting 2.206 enforcement action be taken against all control room operators and higher on duty that shift, including the plant manager and, if they have one, the plant vice president, plus ALL STAs, (Shift Technical Advisors), if they still have them.

The enforcement action would be prohibition from any plant duties for a minimum of 30 days, a refresher course on nuclear instrumentation with a test and a required passing mark, and a 1 hour (minimum) discussion on conservative (and responsible) decision making in plant operations.

This is a 2.206 request.

Yours truly,



Thomas Gurdziel

(I would expect that the installed location of a leakage sensing system, (FLUS), on the lower reactor vessel head (which had not leaked), when the actual problem leakage occurred on the upper reactor vessel head would be part of the conservative/responsible decision making discussion.)