



Mr. James Lieberman  
December 9, 1994  
Page 2

I knew then that previously the RPV was disassembled prior to verifying secondary containment integrity. Accordingly, I did not feel that the delay to verify containment integrity was consistent with this prior practice. Because I thought the delay was not appropriate, I expressed my displeasure (using an intemperate word or two). At the time, I was not familiar with revisions to the procedure in 1990-1991, which added a prohibition against lifting the head prior to verifying secondary containment integrity. Others besides myself (including, as I recall, Rick Gardner) also questioned the rationale for the prohibition in the procedure.

I recall that a temporary procedure change was processed to move the requirement to verify containment integrity to a later step in the procedure. To the best of my recollection, the temporary change was initiated by Jeff Bracsovsky but I do not recall who directed that the change be made. I believe that I was not in the approval chain for the temporary change to the procedure. I recall that detensioning the studs took about one shift to complete. I believe that perhaps Rick Gardner contacted Jim Flaherty subsequently about the need for permanent changes to the RPV disassembly procedures.

I was not involved much in discussions leading up to the SORC meeting on March 9, 1993. I remember that SORC considered the change to procedure 7.4.4 (removal of the RPV head) during the first session on March 9, 1993 and that the meeting was subsequently reconvened that afternoon. I did not attend the subsequent session of the meeting.

I recall Jim Flaherty, the Engineering Manager, presented the proposed procedure changes to SORC. He consulted a stack of reference materials which he had brought to the meeting. I remember looking at the PCN form for the change. I do not recall specifically what other materials were distributed at the meeting for SORC members' information (in addition to the PCN form). I do not recall looking at the NUREG-0612 document, although at the time I believe I was generally familiar with its coverage of the heavy loads issue. I do not recall asking many questions during the meeting or challenging the basis for Jim Flaherty's presentation.

My recollection in general is that SORC considered the purpose of that procedural restriction in relation to safe movement of loads over the RPV and the need to maintain secondary containment integrity as required by the technical specifications. I recall that the meeting lasted a couple of hours and involved a

Mr. James Lieberman  
December 9, 1994  
Page 3

considerable amount of discussion. As I remember, the concurrence portion of the PCN form was blank when the SORC meeting began, and was filled in during the meeting after the procedure was approved.

Typically, as ~~Outage Director~~ I did not attend SORC meetings. I attended the March 9, 1993 meeting in particular because I felt the need to be aware of the procedures governing RPV disassembly which were to be discussed. During the meeting, SORC members discussed so-called "heavy" loads, as addressed by NUREG-0612, and distinguished them from lighter loads addressed by GE PRC 88-11 (loads other than the RPV head, dryer and assembly). SORC also discussed Technical Specification Amendments 147 and 150, which ~~Jim Flaherty~~ had identified in his research. I do not recall whether SORC reviewed copies of the amendments. As SORC viewed it, the proposed procedure changes allowing RPV disassembly prior to verifying secondary containment integrity were consistent with the guidelines of NUREG-0612 and GE PRC 88-11.

My recollection is that SORC was satisfied that the District's actions in response to NUREG-0612 left no credible potential for damage to irradiated fuel as a result of movement of loads during RPV disassembly (i.e., moving the head, separator and dryer). I recall discussion at the meeting on the telecon with GE concerning the scope of PRC 88-11. We were in a somewhat unique position at the time, with the RPV head bolts detensioned under the temporary PCN and the pending procedure changes being considered by SORC. My view at the time was that the 1991 procedure changes probably exceeded the guidelines contained in GE PRC 88-11 because the changes unnecessarily restricted the timing of RPV disassembly. I recall SORC members discussing the NUREG-0612 aspects of the lifting systems in place at the plant (i.e., the systems are designed to withstand single failures).

To the best of my recollection, SORC also discussed an earlier interpretation by the NRC Staff indicating that the technical specifications did not prohibit RPV disassembly pending verification of secondary containment integrity. I do not recall any dissenting votes by SORC members, and to my knowledge the proposed procedure change was unanimously approved at the meeting. I do not recall whether or not ~~John Meacham~~ attended the SORC meeting.

#### Explanation Why NRC Sanctions Are Inappropriate

From my experience as ~~Outage Director~~ for the 1993 refueling, it is important to try to maintain a schedule for

Mr. James Lieberman  
December 9, 1994  
Page 4

refueling activities and schedule demands are primarily self-imposed. Although maintaining a schedule is important, it is of secondary importance to plant safety. In my view, SORC members considered several relevant factors in approving the procedure change, including the requirements for moving loads in secondary containment, GE PRC 88-11, NUREG-0612 and requirements for secondary containment integrity. I do not recall any undue pressure from SORC members or others to reach a hasty conclusion in connection with the procedure changes.

Although I do not recall having personally reviewed all of the background documents discussed at the SORC meeting, it was my understanding at the time that the changes to procedures approved by SORC on March 9, 1993 were considered to be consistent with technical specification requirements for secondary containment integrity. In hindsight, I still believe that SORC's decision was appropriate under the circumstances.

In this regard, I respectfully suggest that sanctions against me personally as suggested in the November 10, 1994 Demand for Information would be inappropriate. As explained above, I believe that my understanding of the matters discussed at the SORC meeting on March 9, 1993, provided an adequate basis for my vote to approve the procedure change. Any sanctions against me personally would result in personal hardship because of my significant investment as a nuclear power professional. I earned a B.S. in mechanical engineering from the University of Nebraska in 1982. My experience includes approximately 12 years of employment by NPPD at the Cooper Nuclear Station (1982 to Present). Prior to that time, I served in the U.S. Navy nuclear submarine program for about nine years (1968 to 1977). I am certified as a Senior Reactor Operator (1990) and am a qualified Shift Technical Advisor (1983) at Cooper Nuclear Station. I have held various positions including Senior Manager of Site Support (1992), Senior Manager of Staff Support (1990), Engineering Manager (1986), Plant Engineering Supervisor (1983) and Mechanical Engineer (1982).

In my current position as Senior Manager of Site Support, I have overall responsibility for supporting site activities in matters related to training, site services, security, outage and modifications, emergency preparedness and personnel coordination. This position reports directly to the Site Manager. This position also has interface responsibility with the Construction Management Department and serves as public relations spokesperson for the site. My additional collateral duties include memberships in the Safety Review and Audit Board and the Station Operations Review

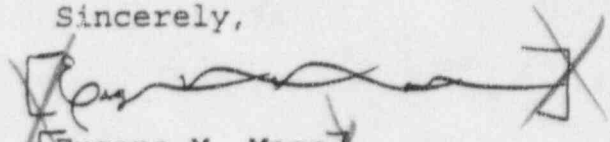


Mr. James Lieberman  
December 9, 1994  
Page 5

Committee (SORC). I am also ~~Technical Support Center Director~~  
under the NPPD Emergency Plan for Cooper Nuclear Station.

I affirm that this letter is true and correct to the best of my knowledge and belief. I hereby request that this letter be withheld from placement in the NRC Public Document Room and from disclosure pursuant to 10 C.F.R. § 2.790.

Sincerely,

  
Eugene M. Mace

Sworn to and subscribed  
before me this 9<sup>th</sup> day of  
December, 1994.

Mary Frances Armstrong  
Notary Public

My Commission Expires:

Jan. 11, 1998

