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Docket Number 50-346
License Number NPF-3
Serial Number 1-1299

January 9, 2003

Mr. J.E. Dyer, Administrator
United States Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

Subject: Submittal of Evaluations Performed at Davis-Besse to Address
U.S. NRC Inspection Manual Chapter (IMC) 0350, Item Number 1,
Adequacy of Root Cause Determination

Ladies and Gentlemen:

On April 18, 2002 (Serial 1-1270), the FirstEnergy Nuclear Operating Company (FENOC) submitted revision 0 of the technical Root Cause Analysis Report regarding the Reactor Pressure Vessel (RPV) head degradation at the Davis-Besse Nuclear Power Station, Unit 1 (DBNPS) pursuant to the NRC Confirmatory Action Letter dated March 13, 2002. Subsequently on September 23, 2002 (Serial 1-1289), revision 1 of the technical Root Cause Analysis Report regarding the RPV head degradation was submitted. As stated in our earlier submittal, the technical Root Cause Analysis does not address findings of inspections of the degraded RPV head section at Framatone ANP's facilities that have been recently reported; i.e., discovery of a previously unidentified circumferential crack in Nozzle 3 and discovery of previously unidentified cracks in the cladding area. Evaluation of these issues is continuing. It is anticipated that the Framatone's evaluation will not have any effect on the conclusions of the technical Root Cause Analysis Report; therefore, no further revision of the technical Root Cause Analysis Report is expected.


Also, on August 21, 2002 (Serial 1-1286), FENOC submitted the Management and Human Performance Root Cause Analysis Report on Failure to Identify RPV head degradation. This Root Cause Analysis Report provided the basis for discussion with your staff during the meeting in the NRC Region III office on August 15, 2002, and also provided the basis for discussion of associated corrective actions during the NRC IMC 0350 Panel meeting on August 20, 2002.

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In addition to the above assessments, FENOC has performed additional evaluations to thoroughly investigate and address the organizational, programmatic and human performance issues that may have contributed to the RPV head degradation at Davis-Besse. Enclosed with this letter provides a copy of those completed evaluations. They include: Root Cause Analysis of Quality Assurance Oversight; Root Cause Analysis of Operations; Assessment of Company Nuclear Review Board; Root Cause Analysis of Corrective Action Problem Resolution Human Performance and Implementation; Root Cause Analysis of Engineering Assessment Capabilities, and Evaluation of Corporate Management. The Collective Significance Review of the RPV head degradation issues is currently underway and is expected for completion by February 2003. When complete, FENOC will transmit a copy. Also, actions to address the issues identified in each of the assessment are currently underway.

If you have any questions or require further information, please contact Patrick J. McCloskey, Manager-Regulatory Affairs, at (419) 312-8450.

Sincerely,


for C.W. Myers

GH/s

Attachment
Enclosures

cc: USNRC Document Control Desk
J.B. Hopkins, DB-1 NRC/NRR Senior Project Manager
S.P. Sands DB-1 NRC/NRR Backup Project Manager
C.S. Thomas, DB-1 Senior Resident Inspector
Utility Radiological Safety Board

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COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station in this document. Any other actions discussed in the submittal represent intended or planned actions by Davis-Besse. They are described only as information and are not regulatory commitments. Please notify the Manager – Regulatory Affairs (419-321-8450) at Davis-Besse of any questions regarding this document or associated regulatory commitments.

COMMITMENTS

DUE DATE

Transmit a copy of Collective Significance Review Report.

February 28, 2003

Enclosure 1

Root Cause Analysis of Quality Assurance Oversight