Mr. Guy G. Campbell, Vice President - Nuclear FirstEnergy Nuclear Operating Company 5501 North State Route 2
Oak Harbor, OH 43449-9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION, UNIT 1 - DOCUMENTATION OF

CONFERENCE CALL OF NOVEMBER 15, 2001, RE: RESPONSE TO

BULLETIN 2001-01 (TAC NO. MB2626)

## Dear Mr. Campbell:

On November 15, 2001, a conference call was held between the staff and representatives of FirstEnergy Nuclear Operating Company concerning the staff's assessment of the Davis-Besse response to Nuclear Regulatory Commission (NRC) Bulletin 2001-01, "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles." This conference call served as timely feedback to you with respect to recent meetings held with your staff at the NRC offices in Rockville, MD, on November 8, 9, and 14, 2001. The purpose of this letter is to document the staff's feedback as discussed during the conference call.

As discussed in the bulletin, the Davis-Besse facility is considered to have a high susceptibility to primary water stress corrosion cracking (PWSCC) at reactor pressure vessel head penetration (VHP) nozzles. Thirteen reactor facilities have been categorized as having either a high susceptibility to PWSCC at the VHP nozzles or a history of cracking or leaking VHP nozzles. To date, eleven of these facilities have performed inspections as recommended in the bulletin and ten of these have identified cracking in VHP nozzles and/or the associated J-groove welds. With respect to the seven operating Babcock and Wilcox (B&W) facilities, the other six facilities (Davis-Besse excluded) have performed inspections as recommended in the bulletin and all six facilities have identified cracking in VHP nozzles and/or the associated J-groove welds. More significantly, three of these B&W facilities have identified circumferential cracking in the VHP nozzles. Based on this evidence, the staff believes there is a more than reasonable likelihood that the Davis-Besse facility currently has cracking in one or more VHP nozzles and/or the associated J-groove welds, the extent of which is not known.

The staff has attempted to utilize the information you have provided in your bulletin responses (which includes the staff's request for additional information) and other supplementary information provided in follow-up to various phone calls and meetings, to help reconcile your position relative to the industry's actual inspection results described above. The staff has not been able to identify from these efforts any factors which indicate that Davis-Besse is unique in some respect such that it could not be considered similarly susceptible.

As discussed in the conference call, the staff believes that, based on the information currently available, inspections as recommended in the bulletin are the only means to provide reasonable assurance of the structural integrity of the VHP nozzles. Therefore, it was requested that any future discussions or submittals on this subject focus on how Davis-Besse is unique or can be distinguished from the inspection results from the other high susceptibility facilities.

Sincerely,

/RA/

Stephen P. Sands, Project Manager, Section 2 Project Directorate III Division of Licensing Project Management Office of Nuclear Reactor Regulation

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Davis-Besse Nuclear Power Station, Unit 1

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