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9 Twin Orchard Drive
Oswego, NY 13126
September 13, 2000

Peter Eselgroth, Chief
Projects Branch 2
Division of Reactor Projects
United States Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

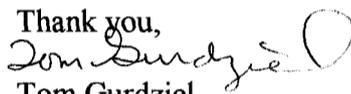
Dear Mr. Peter Eselgroth:

Last night I read Enclosure 2, Part 1 to the Indian Point 2 meeting of 5-3-00. I noticed on slide 15 of 33 that there was a specific entry that the indicated steam generator leak rate was 3.4 GPD, (gallons per DAY), at 7:15 p.m. on 2-15-00. (This is per N-16.)

Since we know that the actual leak rate was about 154 GPM, (gallons per MINUTE), at that time, I have associated 3.4 GPD predicted by N-16 with 154 actual GPM. This leads to the interesting question: What was the actual leak rate on 10/28, (from slide 14 of 33), when the predicted leak rate by N-16 was 4.3 GPD? Was it actually 195 GPM?

I concluded that either the plant has lived with substantial leakage or the leak rate detection system based on N-16 was INOP at the time of the accident. I am bringing this to your attention because I do not believe that I have seen mention of this discrepancy anywhere in the reading I have done on the IP2 Feb 15th event.

I am suggesting that, if the present equipment cannot be maintained and calibrated to give accurate values, it be replaced with something else. And, if Emergency Plan leak rate action levels are given in GPM, then the reading of this indicator should also be in GPM. Please give this matter any attention you may feel it deserves; I do not need a reply.

Thank you,

Tom Gurdziel