

From: Marc Ferdas
To: David Lew
Date: Fri, Feb 23, 2001 2:48 PM
Subject: paragraph replacement

see attached

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Possible replacement paragraph for the last paragraph of rev 8 of NRC Response.

Contained within your letter and affidavits were statements that suggest there has been no evidence that tube noise levels might impact detection; this is inconsistent with available industry information and basic eddy current theory. In fact in 1993 the NRC issued Information Notice 93-05 which alerted licensees to Draft NUREG 1477 "Voltage-Based Interim Plugging Criteria for Steam Generator Tubes." NUREG 1477 states that, "...noise criteria should be incorporated that would require that a certain specified noise level not be exceeded, consistent with the objectives of the inspection. Data failing to meet these criteria should be rejected and the tube should be reinspected. These criteria should be broken down into criteria for electrical noise, tube noise, and calibration noise." Further, you observed a magnitude of signal noise in some areas of the low row u-bends which was as large as the magnitude of the signal from a postulated through wall PWSCC flaw during your 1997 steam generator tube inspections which was unaccounted for. Your response and associated affidavits contain additional statements in which we are in disagreement with your position. However, we do not intend to address each of these points, because these issues have been previously discussed with your staff during and after NRC's steam generator special inspection.