

From: David Lew
To: Bill Bateman, Edmund Sullivan, Emmett Murphy, Jack Strosnider, Stephanie Coffin
Date: Thu, May 18, 2000 4:26 PM
Subject: IP2 SG Inspection Plan

Here's the strawman for the inspection plan.

My next steps are (1) to incorporate any comments from you on the plan and (2) to propose a strawman for sequence of events (NRC actions) to ensure the SE and inspection are coordinated. Regarding the latter, we should probably get together on a conference call after I have a strawman put together.

CC: Brian Holian, Jefferey Harold, Marsha Gamberoni, Wayne Lanning, Wayne Schmidt

A/95

ITEM #

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(3)

**Special Inspection Plan
Indian Point 2**

NRC Inspection 50-247/2000-008

I. Inspection Objectives

- A. Independently verify selected information, which was provided by Con Edison, in support of the NRR's safety evaluation of the operational readiness of the Indian Point steam generators for operation during the next cycle.
- B. Assess the licensee's performance with respect to the steam generator eddy current testing conducted during the 1997 refueling outage and the current outage.
- C. Assess the effectiveness of licensee's identification, corrective actions and root cause analyses in response to indications of steam generator degradation mechanisms.
- D. Address potential enforcement issues that may arise during the inspection

II. Inspection Scope

- A. Verify and review selected information in support of NRR's safety evaluation. These items will be identified during NRR review of licensee's operational assessment and development of the safety evaluation.
- B. Review vendor-licensee interface including (1) degree of licensee oversight contractor analysts, (2) degree of independent licensee review of contractor work, and (3) degree of independent licensee assessment of steam generator conditions.

Review licensee's 1997 eddy current inspection program to determine whether both the intent and the compliance with EPRI guidelines, which were in effect at the time, were met.

Review (1) qualification of analyst, (2) the quality of licensee specific training provided to analyst, (2) the licensee's process for remediation of missed calls by analyst, and (3) the licensee's tracking, trending, assessment and corrective actions to missed analyst calls. This review should include the assessment of the number of missed calls by one of the two independent analysts during the 1997 inspections.

Review the licensee's effectiveness in identifying, assessing and compensating for conditions impeding the effectiveness of steam generator eddy current inspections. This should include the review of the analyst guidelines, in light of site specific steam generator conditions.

- C. Develop a history of the IP2 steam generators, including when each degradation mechanism was identified and the degree of degradation. Develop a timeline of operating experience on steam generator eddy current inspections and degradation mechanisms.

For each of the identified degradation mechanisms, determine the licensee's assessment and corrective actions to the degradation. These should include at a minimum:

- * Hourglassing
- * Ovality
- * PWSCC in the free-span area
- * Tube Denting
- * Copper and magnetite deposition

- D. Identify potential compliance issues. Note that for all deficiencies and degraded conditions identified, ensure that the licensee was in compliance with their corrective action process, including documenting the deficiency in a condition report and completing identified corrective actions to correct the condition or prevent recurrence.

III. Inspection Members

Wayne Schmidt, Lead Inspector
Greg Cranston, Region I (Tentative)
Caius Dodd, Contractor (Tentative)
Ian Barnes, Contractor (Tentative)
Manu Subutdi, Contractor (Tentative)
Emmitt Murphy, NRR (In-office Support Only)

IV. Inspection Schedule

Inspection entrance meeting is planned for June 1, 2000. On-site inspection and inspection exit meeting will be determined later.

Inspection will be conducted under the guidelines of the reactor oversight program. Inspection hours to be charged to procedure 93812 and prep/doc charged to TACs SEP/SED, respectively.

V. Inspection Support

EPRI guidelines in effect in 1997
Operation Experience Information on SG degradation and inspection
Indian Point 2 past operational assessments
Enforcement history associated with tube rupture events in the industry