

**From:** Thomas Shedlosky  
**To:** Pete Eselgroth, Wayne Schmidt, William Raymond  
**Date:** Tue, Jul 18, 2000 2:19 PM  
**Subject:** Re: ConEd Feedback

I spoke with Doug Gaynor this morning and explained the risk analysis assumptions and its results relating to both CDF and LERF. I believe that he understands its basis.

ConEd is expected to argue that the risk is less than that calculated by the NRC because the February 15th SGTR event was of an actual size smaller than the design basis SGTR analyzed in the PRA and the NRC risk analysis. This gives the plant operators more time to identify and isolate the faulted steam generator, and to depressurize the RCS. The results of the human reliability analysis (HRA) are more favorable for success, with a lower CDF and LERF. Human errors are the dominant contribution to core damage in a SGTR.

However, because NRR/DSSA/PRAB supported Region I and developed the risk assessment for CDF and LERF (Reference: Memo Barrett to Blough, dated May 4, 2000, TAC No. MA8219, and ADAMS: ML0037090430) they should be involved in its further evaluation. Also, NRR has taken a position in that analysis that because of the flaw size (about 2") it was capable of bursting to the extent assumed in the PRA.

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>>> William Raymond 07/18 1:39 PM >>>

Pete - FYI

At the Resident weekly debrief with ConEd staff on July 18, McCann provided the following feedback on topics of recent interest:

- 1) There continues to be a "divergence of views" with NRC findings (Wayne's SG inspection) regarding the 1997 SG inspections. ConEd intends to provide more data in support of their position at the exit meeting on Thursday.
- 2) ConEd disagrees with a potential "RED" finding WRT to the February 15 event, and specifically with the NRC assumptions on the size of the leak used in the estimates for the large early release fraction (LERF). ConEd intends to submit data to show the total RCS leakage available for release was less than assumed by the NRC.
- 3) ConEd raised a question whether it was getting "due process" under the new ROP to address findings that were not green - particularly with respect to the findings related to the February 15 tube rupture. We discussed the opportunity that exist to provide feedback now via direct communications between the NRC SRAs and the ConEd's Doug Gaynor, and formally after the findings are issued in an inspection report. ConEd intends to pursue this further.

Bill

CC: Brian Holian, David Lew, James Trapp, Peter Habighorst, Wayne Lanning

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