

From: Brian Holian
To: A. Randolph Blough, Daniel Holody, David Lew, Emmett Murphy, Hubert J. Miller, J. Bradley Fewell, Jack Strosnider, James Trapp(...)
Date: Thu, Sep 21, 2000 3:22 PM
Subject: feedback from ConEd on Reg Conf.

A discussion with John McCann, ConEd, indicated that the licensee is still fine tuning their presentation for Tuesday's Reg Conf. in RI - however the following are highlights:

1) ConEd will take issue with the NRC position of assigning a probability of tube rupture at the end of the two year period as being 1.

They will state that R2C5 was not a tube rupture. They will state that insitu tests showed that none of the other tubes were on verge of tube rupture....therefore...they will state that you could also reasonably conclude that probability was zero for a "tube rupture"

ConEd will present their development of a more appropriate probability of a "tube rupture"

They will discuss metallurgy (for 30 minutes or so...)

They will look at R2C5 and concentrate on why that leak stopped; stating that at the tip of the crack the material is effectively ductile (not brittle).

They will look at fracture mechanics and state, based on the length of the flaws and the ligaments, that a rupture was not probable.

They will state that the probability of a tube rupture is not .5....(e.g., in answer to NRC argument that we have had 2 cases (Surry and IP2 - and one was a clear rupture)) - but , rather , according to their calculations, probability of tube rupture is an order of magnitude lower (approx. .049).

2) Then they will take on CDF = LERF. They will state a large early release is not considered likely. they will credit training and time available. They will look at all 4 cases in the SDP, concentrating on Spontaneous tube rupture and MSLB. They will state the spontaneous tube rupture calc appears to be overestimated by factor of 10.

3) They did state that they will also argue the performance issues in general.. nothing new to be stated there... They said the bulk of the argument would be on the risk issues.

4) Finally, they would end with where have they gone from the event. They are replacing steam generators and have "upped" their inspection attributes.

I reminded him about our SDP process and how it is to look at delta CDF and not CCDP... He stated that they know that...and feel under the process the utility can make any arguments under Phase III. He also stated that "we know that this process is only in its first year"... indicating a willingness to take on the SDP logic itself.

He concluded with their conclusion that they take the issue to "White" on CDF, and "Yellow" considering any LERF issue. He stated they are continuing to fine tune issues, some aimed at taking the risk lower...looking at differences in NRC assessment (e.g, NUREGS basing issues on High Head SI, etc.)

BH

CC: Joseph Shea, Patrick Milano

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