

**From:** Edmund Sullivan  
**To:** David Lew  
**Date:** Wed, Jul 5, 2000 12:02 PM  
**Subject:** Comments on the Quick Look

David,

Please see the attached for our comments on the quick look writeup. The reflect comments from DE but I have not heard back from Joe Muscara yet.

Ted

A/255

(2)

During the conference call this afternoon (6-30-2000) Wayne Schmidt asked us to provide in writing comments on the "Quick Look Letter." After the phone call there were additional discussion within the DE staff. The following reflects the subsequent discussions.

We would agree with the conclusions that Con Edison's weak technical management and oversight of the 1997 inspections contributed to the failure to identify indications in six SG tubes, including the tube that failed. However, the statements that follow in the second paragraph of the quick look seem to indicate that had Con Ed done a better job with the data they had they would have averted the problem. For example, it states that Con Ed did not evaluate and take necessary actions to compensate for new degradation mechanisms that increased the likelihood of tube integrity problems, or address equipment and technique challenges to flaw detection when existing data were readily available. (Underlining added.) Notwithstanding that a hindsight review reveals flaws in the 1997 data that were found in 2000, there was a serious data quality issue in 1997 that Con Ed management responsible for SGs should have been aware of and addressed. There are a number of reasons we should be careful about the message that we send to IP-2 and the industry on this issue. For example, if we imply that a better analysis job of the same data would have addressed this problem, IP-2 would surely have ended its cycle in 2000 with tubes not satisfying 3dP or worse. Also, if we imply that a better analysis job of the same data in 1997 would have addressed this problem, we have a conflict with our current situation which is that we are having trouble concluding that they can restart and run for even a short period of time even though they did a better inspection in 2000. Also, the issue of hindsight has always been a delicate issue. What we say here will have broad implications and could come back to haunt us in a variety of other situations. (This is part of the reason that we agree with your interpretation of the hindsight analysis of the data but are not keen about sending a strong a message about missed calls. This is not a new issue and our stance on hindsight calls comes out of a lot of reflection about this area.)

Our view is that after pointing to management oversight as the summary statement of the problem, it would be beneficial to send a focused message from which industry can derive a lesson. We believe the next most important statement that can be made concerns the item that stands out as the most clear problem that should have been apparent and should have been addressed by the licensee. We think that in so many words that the most significant action Con Ed should have taken was to address the poor quality of the data. We have been discussion with you a number of actions that Con Ed could have been taken to address poor data quality.

From there we can go on to discuss other related weaknesses. Related weaknesses include over looking the significance of the apex location of R2C67, not considering it in the context of the advance state of denting, and having no information on the level of hourglassing of the affected flow slot.

We can also point out missed opportunities. The missed opportunities include:

- Use of a meaningful standard for monitoring hourglassing of the flow slots
- Failure to recognize that their ECT uncertainties were larger than those assumed in the industry in-situ testing criteria; this could have led the licensee to recognize that they could not rely on this criteria as justification for not in-situ testing tube R2C67.

- The depth of the indication in R2C67 (called at approximately 80%) should have been an indication that it was not logical to assume that this was the only tube with significant indications.

Regarding the fourth item in the quick look concerning set up, it may be best to hit this in the report rather than the quick look since it is not the main message and since the analysts say that it would not have made a big difference.