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Subject:	Re: Status: Region I actions re: prep of response to Con Ed Denial of NOV
Creation Date:	1/30/01 7:18AM
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IP2 Letter App B.wpd	12067	01/29/01 01:25PM
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ITEM # 192 B1

From: David Lew
To: Daniel Holody, Hubert J. Miller, Marc Ferdas, Michael Modes, Richard Urban, Suresh Chaudhary, Wayne Schmidt
Date: 1/30/01 7:18AM
Subject: Re: Status: Region I actions re: prep of response to Con Ed Denial of NOV

Borchardt signature is not called out specifically in the ROP. However, we will discuss the issue today.

Attached are some of the statements that we would consider responding or at least be congizant. This will also be a topic of discussion.

The LLTG report is quoted in two places:

App B, page 20: This is supported by the fact that various experts consulted by the NRC have evidently reached different decisions on this matter [ease of detection of R2C5], based on the same baseline information. This differing viewpoints regarding the ease of discovery of this indication supports licensee's position.

Affidavit of Gregory M. Turley (Level III/QDA, vice president of Corestar Internaional Corporation): A statement quoted from the November 2000 NRC Lessons Learned report coincides with the previous statement [R2C5 cannot be readily detected]. In that report the NRC states "Experts that the Task Group interviewed held different views on whether the flaw in Row 2 Column 5 could reasonably been detected from the data."

>>> Hubert J. Miller 01/25 5:57 PM >>>
Dave, thanks.

Is the Borchardt signature specifically called for in the ROP?

I assume we are getting review of ConEd's response in sufficient detail to identify statements/claims that they might make that we do not agree with. Please confirm this and that we will address each of these in some fashion.

Please, in particular, highlight any statements made about the Newberry report conclusions that they may claim support their position.

Thanks. Hub

>>> David Lew 01/25 5:39 PM >>>
On Tuesday, we will have a conference call with OE, IIPB, NRR Projects and EMCB to discuss the reply to the Con Ed's letter contesting the NOV. The goals for that meeting are to: (1) agree that Borchardt is signing the letter, (2) agree that the violation should stand, (3) discuss/elicit thoughts on how to frame our letter and (4) to identify issues, particularly the ones in the affidavits, that the technical staff should take the lead for developing a position to refute the expert opinion.

Before we get to the meeting, **we need internal Region I consensus**. Attached is a proposed draft letter. Mike Modes is compiling the statements from the affidavits which we think should be addressed by HQs. Suresh and Marc are compiling the arguments from Appendix B of Con Ed's letter. Marc will be the point of contact for comments and for distribution of Mike and Suresh's work, since I am at Beaver Valley today and tomorrow. Wayne Schmidt needs to look at the draft letter, Mike and Suresh's work early Monday. On Monday, I will try to get on Hub's and Jim Wiggins's calendar for their thoughts.

CC: A. Randolph Blough, Brian Holian, James Linville, James Wiggins, Pete Eselgroth,

Scott Barber, Wayne Lanning

January 29, 2001

Indian Point 2 Response to Violation
50-247/2000-10
Con Ed Letter, Appendix B

	Ref.	Licensee Statement	Comment
1	**Sec A** para1 pg19	SG tube in service examinations were conducted in accordance with industry guideline and requirements applicable at the time of examination	EPRI Guidelines
2	para1 pg 19	1997 inspections used conservative approaches in both selection of inspection sample, and in the analysis guidelines and reporting requirements	EPRI Guidelines
3	para1 pg 19	Data were analyzed by experienced and qualified personnel who received site specific training in accordance with Revision 4 of the EPRI PWR Steam Generator NDE Guidelines	EPRI Guidelines
4	para1 pg19	Probes, techniques and procedures were the most advanced qualified technology available at the time	10 CFR 50 App B
5	para2 pg19	Although not required, the licensee hired an independent eddy current expert to provide oversight of the principal contractor	10 CFR 50 App B
6	para3 pg19	Failure to detect instances of PWSCC in 1997 was associated with the inherent subjectively-based limitation of eddy current testing at that tome, and was acknowledged by the NRC through Info. Notice 97-26, (5/19/97)	10 CFR 50 App B
7	para1 pg 20	Ease of detection of the indication was questionable, and it is supported by various NRC consultant opinions in TAC No. MA9163, dtd 10/23/2000, p 9)	10 CFR 50 App B
8	para2&3 pg20	Current inspection capability and standards should not be applied retroactively to 1997. This is supported by several affidavits of SG inspection and eddy current experts	10 CFR 50 App B
9	**State-ment1** para1 pg2	During 1997 inspection a single U-bend PWSCC indication was detected; the indication did not leak at the EOC-13, and the tube R2C67was plugged consistent with industry practice	10 CFR 50 App B
10	para2&3 pg21	The EPRI PWR Steam Generator Guidelines, Revision 4, Volume 1, recommended SG tube inspection frequency and sample size. The requirement for U-Bend IGA/ODSCC/PWSCC is 100% of Row 1 & 2. The 100% inspection of Row 2 & 3 U-Bends with a qualified, rotating +Point coil met this requirement.	EPRI Guidelines
11	para4 pg21	The indication found in 1997 was based on the first +Point inspection of the IP 2 low row U-Bends; it was reasonable to conclude that the detection of U-Bend PWSCC in R2C67 was due to enhanced detection capabilities of the +Point probe than to accelerated tube deterioration during Cycle 13	10 CFR 50 App B

12	para2 pg22	The appearance of a single Row-2 U-Bend PWSCC indication was not an unusual event, and the characteristics of the indication were consistent with the data included in the SSPD training and testing materials. The plugging of tubeR2C67 was an appropriate response	10 CFR 50 App B
13	para4&5 pg23	The +Point probe was qualified and added to the EPRI performance demonstration data base in May 1996. The NRC IN 97-26 described this test as qualified for detecting indications in small radius U-Bends "in accordance with enhanced qualification criteria developed by EPRI"	EPRI Guidelines
14	para1 pg24	PWSCC in the R2C67 tube was not an unexpected finding thus no modification to the inspection program was needed, and the program covered 100% examination using the most sophisticated qualified probe available	10 CFR 50 App B
15	**State-ment2** para2 pg25	1997 low-row U-Bend probe restriction should be evaluated in light of historical experience. In 1997, 19 tubes had restriction that prevented a 0.610-inch +point probe from passing through the tube. This was specifically discussed in the RAI response to Question 11	10 CFR 50 App B
16	para4 pg25	The significant factor in 1997 examination was that the +point probe was of different physical geometry. All previous U-Bend examinations had been performed with very flexible ball joint bobbin coil probes of different mech.	10 CFR 50 App B
17	para3&6 pg26	Because of the different probe geometry, the licensee concluded that the most of the probe restrictions encountered in 1997 were due to conditions existing before 1989	10 CFR 50 App B
18	**State-m ent 3** para4 pg27 para2&3 pg29	In 1997, no formal criteria existed in the industry for quantitative evaluation of noise, and it should be noted that EDM notches typically yield larger signal amplitude for a given depth than PWSCC	10 CFR 50 App B