

Quick Look at Indian Point 2 Inservice Inspection

I conducted a quick look at the NRC's inservice inspection conducted in 1997 at Indian Point 2. The procedure in effect at the time is believed to be issued 5/4/95 with a subsequent revision in 1998. The core inspection was scheduled for 32 hours. Based on RPS/IP, a total of 33 hours were charged to the procedure.

I paraphrased the inspection requirements below. Of importance is item No. 7, where the "requirements" are guidance. Based on a review of the inspection report, I attempted to correlate the documented inspection to the inspection requirements:

1. Review licensee's ISI plan and scheduled for the current inspection period of the inspection interval. Determine if changes to the inspection plan concerning component selection, etc. have been properly documented and approved.

"Con Edison's ISI outage plan included welds on the following ..."

2. Review the qualifications and certifications of the inspection personnel (Level I and II) observed during observation of work identified in section 2.03, Review the qualifications of all Level III examiners involved with ISI.

"The inspector reviewed records of the qualifications and certifications of the Westinghouse personnel involved in the performance of the steam generator tubing and eddy current data acquisition and analysis activities."

3. Observe or perform three methods of examination of components.

"EC analyst (primary, secondary and resolution) appeared to be performing analysis in accordance with the EC analysis procedure."

Based on discussion with the inspector, Joe Carrasco, Joe indicated that his supervisor provided direction to focus on the eddy current testing. This guidance appeared appropriate and consistent with the guidance in No. 7.

4. For each selected method of examination from paragraph 2.03, verify that (a) approved procedures are available, (b) examination personnel are knowledgeable, (c) examination personnel are properly qualified and certified, and (4) exam results, evaluation of results, and any corrective actions/repairs/replacements are being recorded as specified in the ISI and NDE procedures.

"The inspector reviewed records of the qualifications and certifications of the Westinghouse personnel involved in the performance of the steam generator tubing and eddy current data acquisition and analysis activities."

"EC analyst (primary, secondary and resolution) appeared to be performing analysis in accordance with the EC analysis procedure."

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5. Observe two Code repairs and two Code replacements activities and verify that (a) an approved procedure is in use, (b) personnel responsible are knowledgeable, and (c) the ANI and ANII is involved to the extent required by the licensee's ISI plan.

Based on discussion with the inspector, Joe Carrasco, Joe indicated that his supervisor provided direction to focus on the eddy current testing. This guidance appeared appropriate and consistent with the guidance in No. 7.

6. Evaluate effectiveness of corrective actions and effectiveness of licensee controls over ISI contractors. Determine any strengths and weaknesses in the licensee's corrective actions.

"The inspector verified that Con Edison has adequate control over the Inservice Inspection nondestructive examination (NDE) activities of the present outage."

7. **The items listed in this procedure are only guidelines for the inspector to follow. It is not expected, and not possible, for the inspector to complete all areas of this procedure. In some instances, an in-depth review of one NDE procedure may provide more insights into licensee activity than reviewing three examinations in less detail in the same amount of time.**

Based on this quick look, it appears that the intent of the inspection procedure was met. Regarding the capability for the NRC to challenge analysis calls, the procedure does state an option for having contractors review ISI data. While this was not performed, the inspector indicated that he interviewed multiple examiners on the same eddy current data to gauge the knowledge and understanding of the examiners of the information.