

### Guess at Basis for Licensee's Disagreement

The SPSB staff has not seen any direct rebuttal of its risk assessment, but has reviewed a licensee analysis of the *conditional probability* of the low flow rate failure that they actually experienced would proceed to core damage.

The basis for the licensee's alleged assertion that the color is "green" appears to be based on that assessment and their position that they performed all the inspection that was required by "industry standard practices."

*white*

The staff disagrees that the conditional probability of the specific failure experienced is the proper basis for determining the significance of the condition that was created by the insufficient inspection.

The staff also does not agree that the leak rate could have been presumed to remain at the modest value actually experienced for some of the extended periods considered in the licensee's human error analyses. Some of these errors would have allowed the failed tube to stay at a high pressure differential for a much longer period or even increased the differential pressure above that experienced during pre-failure operation. The flaw in the tube appears to be capable of substantial additional opening as remaining ligaments fail.

The staff also does not agree that the 1997 tube inspection was acceptable because it met certain practices nor that it properly met those practices.

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