

COMMUNICATIONS SUMMARY FOR

FINAL SIGNIFICANCE DETERMINATION AND NOTICE OF VIOLATION (NRC INSPECTION REPORT 05000247/2000-006)

The purpose of the letter was to provide the licensee with the NRC's final determination on the three preliminary White findings related to the Indian Point 2 Nuclear Power Plant emergency preparedness (EP) program identified in the subject inspection report. These inspection findings were assessed using the Significance Determination Process (SDP) and were preliminarily characterized as White (issues with low to moderate importance to safety, which may require additional NRC inspections). On June 2, 2000, the NRC completed the subject inspection of the Indian Point 2 Nuclear Power Plant EP program, and preliminary findings presented at an exit meeting. Following the review of the preliminary findings by an NRC SDP panel, the licensee was informed of the results by telephone on July 14, 2000. These results were also documented in NRC Inspection Report 05000247/2000-006 issued on the same day.

The letter sent with the inspection report provided IP2 the opportunity to attend a regulatory conference or submit a written response to the findings. In a telephone conversation with Mr. R. Conte of NRC, Region I, on July 18, 2000, Mr. F. Inzirillo, ConEd, the licensee indicated that Consolidated Edison did not contest the characterization of the risk significance of these findings and felt there was no need for a Regulatory Conference or a written response at that time.

The NRC has concluded that these three inspection findings are appropriately characterized as White. These White findings involved failures to meet NRC emergency planning standards for: (1) the timely augmentation by the emergency response organization, (2) the timely accountability of onsite radiation emergency workers, and (3) the factual and consistent dissemination of information to the media and a local official. These failures contributed to emergency response deficiencies that were exhibited during the course of the SGTF Alert event. Using the SDP, we determined the findings to be White based on the failures to meet the associated emergency planning standards in 10 CFR 50.47(b).

The failures to meet the emergency planning standards of 10 CFR 50.47(b) are violations and are described in the attached Notice of Violation to the subject letter. These violations are being cited in accordance with the NRC Enforcement Policy for the NRC Power Reactor Oversight Process, as described in NUREG 1600, because they are associated with White findings.

ConEd is required to respond to this letter. The NRC will use the response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements. The NRC will also notify ConEd by separate correspondence of any additional agency follow up actions as determined by the NRC Action Matrix.

We found that the short-term corrective actions taken in response to the problems highlighted during the February event were adequate. While ConEd continued to exhibit some weaknesses in the Joint News Center activities, the emergency response organization

J/7

demonstrated its ability to implement the onsite emergency plan during the June 1, 2000, exercise.

As you are aware, Indian Point 2 is an agency-focus plant and has a Long Term Improvement Program in progress. In accordance with the NRC letter issued May 23, 2000 (subsequent to the NRC Senior Management Meeting), we expect to be reviewing the progress of the licensee's Improvement Program which is aimed at improving overall station performance. In that vein, a meeting will be conducted in the future between the NRC and the licensee to further understand the results of the licensee's assessment of their progress towards improvement, to review the status of the licensee's progress, and to understand remaining planned actions regarding completing their Long Term Improvement Program.

Questions & Answers on the IP2 EP FU Inspection Report (05000247/2000-006)

1. Can you summarize the findings? In plain English?
 - A. See above summary (particularly the 3rd paragraph).

2. What does it mean when you say "These findings were assessed..... as significant findings that were preliminarily determined to be "white" findings with some increased importance to safety..."
 - A. In accordance with the NRC's new oversight process, the NRC issues a report with its preliminary findings for those findings of "white" or higher significance. Then, the licensee may provide its view before any final determinations are made on significance - thus, the term preliminary. If the final determination is that they are indeed "white" or higher findings, it means that the findings had some increased importance to safety, which may require additional NRC inspection.
 - B. The licensee views would be factored into our final determination. We consider information provided by the licensee to ensure that NRC has all the necessary and accurate facts to make the final determination on significance. The licensee's input is not an opportunity for them to adversely assuage us or influence our decision.

In this case, the licensee opted not to have a regulatory conference and did not provide any written response.

3. It appears that the licensee opted to not have a regulatory conference to avoid continued bad publicity in the emergency preparedness area as manifested in the Alert of February 15, 2000. Do you know for sure why they opted not to have a conference.
 - A. The licensee reported that our report was accurate overall with respect to the three white-finding determinations (minor inaccuracies in detail may later be identified but they were confident the inaccuracies would not effect the white findings and related determinations). Accordingly, they reported that they felt there was no need for a regulatory conference or written response.

4. Doesn't that mean this plant shouldn't restart before these issues have been properly addressed?
 - A. No. The findings did not involve risk significant planning standards directly affecting the protection of public health and safety. Accordingly the findings are not tied to restart but they are important problems that

need to be resolved. All issues have been acknowledged by the licensee and were either corrected or placed in its CA program, including the more significant white findings.

4. What type of enforcement is this action?

A. It is escalated enforcement because of the significant findings (white); however, there is no civil penalty. In accordance with NRC enforcement policy dated May 1, 2000 (page 8 NUREG 1600) NRC uses colored findings depending on significance in the Oversight Process along with an Agency Action Matrix in order to determine appropriate action. Our final significance determination was three white findings which were also violations of NRC requirements. No civil penalty was assessed because there were no actual consequences in terms of the capability of local authorities taking protective actions for the public.

As indicated in the cover letter for this enforcement action, the next step is to place the white findings into the Action Matrix along with the findings in the other cornerstones. Since the instructions in the notice of violation requires a response in 30 days, we (NRC staff) anticipate that our additional action will not occur before receiving the licensee's response letter. (See projects as to when we would do this (practically but this is hard to estimate right now?))

5. Doesn't the new Reactor Oversight Process preclude fines for this type of issue? Are you assessing this plant under the old program or the new?

A. We are assessing the findings under the new program. Violations that are assessed by the SDP may be cited and are not normally subject to civil penalties. The issuance of a civil penalty now depends on actual consequences.

6. In addition to the "white" findings, you also list six additional findings involving failures to implement regulatory requirements. Taken as a whole, doesn't this mean this system is broken?

A. No. The other violations were determined to have Green significance. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. The licensee is required to correct these problems; however, in the new oversight process we do not integrate Green findings as a part of the assessment process. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections.

If needed: White or higher findings input into the assessment process are considered in accordance with the agency Action Matrix.

WHITE findings indicate issues that are of low to moderate safety significance. WHITE corresponds to performance that may result in increased NRC oversight.

YELLOW findings are issues that are of substantial safety significance. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight.

RED findings represent issues that are of high safety significance with a significant reduction in safety margin. RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED.

7. The original inspection report stated that the additional violations were entered into ConEd's corrective action process. Is this the same process that failed to correct similar problems identified in August and September?
 - A. Yes, however, their corrective action process is improving as evidenced by improved performance in certain areas. Further, the Green findings documented in the EP follow-up report occurred at the time of the event on February 15-16, 2000. The report notes that a number of the green findings have been corrected or are well on the way to being corrected. The corrective action process at IP2 exhibits some weaknesses but it is resulting in improvements.
8. How can we have confidence these issues will be addressed this time around?
 - A. We have confidence because the inspection noted improvements being made in the emergency preparedness program. Some of the problems are so deep-rooted that it will take some time to resolve. Notwithstanding those problems, there is reasonable assurance that the licensee will take protective measure for public health and safety since there are no deficiencies associated with risk significant planning standards directly affecting public health and safety.
9. Don't all of these findings contradict the AIT findings and the discussion of EP at the AIT exit meeting? Why wasn't the public aware of these shortcomings before?

- A. Not at all. The AIT report formed the factual basis for focus, follow-up, and determinations by the AIT follow-up and EP (emergency preparedness) follow-up inspection teams. Both teams were on site in overlapping weeks and there was a coordinated effort between both teams to segregate EP related problems and performance issues from the non-EP areas.

The public was made aware of the EP performance issues through inspection reports 99-12 issued January, 2000 and 2000-006, (recently issued).

10. Did you develop these findings after the "ConEd internal memo" was brought to your attention?

- A. No. The NRC began this inspection and was aware of all of the broad EP performance issues well before the internal memo was publicized. The exercise of June 1st was the fulfillment of a commitment ConEd made to the NRC when weaknesses were identified shortly after the September 1999 exercise (IR 99-012). The commitment was for them to be subjected to another evaluated exercise by NRC staff by June 30, 2000. The commitment date was provided by the licensee and was a reasonable time when program improvements would be made and sufficient training was conducted.

Although relatively new since September 1999, the program findings on augmentation, accountability, and operation of the Joint News Center were initially developed by the Augmented Inspection Team and followed up on by the EP follow-up team. In light of these new findings and the urgency of the matter, the licensee scheduled the evaluated exercise to be on June 1, 2000.

ConEd's internal memo addresses essentially the same performance issues identified during the AIT and in this report. These aren't new issues, just further development of details and examples.

11. You already know evacuation is impossible, the steam generators are broken and now the emergency planning group has all of these problems. How can you even begin to consider allowing this plant to restart?

- A. Con Ed is required to receive NRC approval to operate with the existing steam generators. We will not give that approval until we are convinced the plant will be operated safely. Having said that -- the steam generators are the only restart issue. FEMA has reaffirmed the adequacy of the state and local county emergency plans. As far as the onsite emergency planning problems go, the company has addressed most of them and is in

the process of correcting others. We believe they have made sufficient progress in this area.

NRC Methods to understand Con Edison Performance in the long-term corrective actions docketed to the NRC (November 8, 1999)

A. Human Performance Improvements

-Periodic, structured, human performance stand downs

- Interviews with personnel (shift managers, NPOs, mechanics, electricians, chemistry technicians)
- Documented in IR 2000-03 one human performance stand down just prior to reduced inventory

-Periodic self-assessments of station human performance

- Evaluate results in quarterly corrective actions program assessment (recently CR 200005411 documents a lack of awareness in work control Crs)
- Once an action plan from completed assessment developed evaluate how actions will be implemented
- Evaluate monthly error reduction metrics when developed (August, 2000)

-Assessment of knowledge weaknesses associated with administrative procedure requirements, and plant design and licensing basis

- Evaluate engineering assessment (performed during week of July 24 with exit on July 28)
- Process changes on Operability evaluations not scheduled for completion until 12/31/00
- No specific performance issue exists with this performance area. Have corrective action program print out cause codes assigned to knowledge of design and licensing basis and trend over last few months.

-Formal training in human performance evaluation techniques

- When training completed (expected in August, 2000) evaluate how it is being applied to the corrective action process and department self-assessments.

- Effectiveness Reviews

- Inspect this area in late 2000. The reviews are not scheduled to be performed by Con Edison until August, November, 2000 time frame.

B. Corrective Action Program Improvements

-Expectations for evaluating and implementing corrective actions

- Monthly Corrective action program performance metrics and evaluation quality and timeliness and timeliness and quality of corrective actions (at the resident office)

-Assessment of corrective action program

- Understand weaknesses from assessment and any changes in performance (copy of quarterly CAP assessment in resident office)
- Interview various first line supervisors, workers, and Corrective action group members on strategies for initiation and or evaluation of condition reports

C. Operations Improvements

- Clarify roles and responsibilities of operating teams and their supervision
 - Interview 2 of the five operating crews to understand if improvements or not have been realized
 - Around the clock coverage of plant operations during startup with a focus on CONDUCT OF OPERATIONS
- Lessons learned from event during monthly meetings
 - Provide copies of minutes to monthly Shift Manager meetings with Operations Manager or observe one of the meetings.
- Lessons learned training is being provided for operations personnel in certain areas of system operation, electrical theory, TS applicability and log-keeping
 - Independently evaluate quality of control room logs periodically. Recent AIT followup of 2/15 event concluded log-keeping poor
 - Confirm attendance and subject matter on lesson learned training. Interview selected operators for insights into quality and depth of training

D. Maintenance Improvements

- Improvements in work planning
 - Evaluate any improvements in Instrument and Control Planning by discussion with IC technicians
 - Evaluate condition report trends as a causal factor being improper planning
 - Any NRC inspection insights from PMTs, or emergent work should be included
 - Performance indicators on maintenance backlogs
 - Evaluate performance metrics on work planning when developed in August, 2000
- Improvements in work performance and work management
 - Performance indicator on repeat maintenance trends
 - NRC walkarounds on areas identified as material upgrade in Maintenance Business Plan
 - Any NRC inspector observation on maintenance rule or PMT quality
 - Interview maintenance personnel on the quality of maintenance procedures and the need for procedure upgrade
- Training and qualification and work management
 - Evaluate current status of individuals qualified and recent trends
 - Evaluate performance indicator on Training when developed in August, 2000
 - Performance metrics on scheduled vs. completed work, and amount of emergent work

E. Emergency Planning Improvements

The emergency planning improvements detailed in recovery plan have had recent NRC observations in last EP inspection and drill observation of the June 1, 2000 report. At this time it appears we have a reasonable amount of assessment in Emergency Planning.

F. Work Control Optimization

-Backlog reduction and improved work management will be achieved through the development and management of a single daily integrated schedule

- Evaluate work control performance metrics of maintenance backlogs and operator burdens
- Interviews with work control, operations, maintenance personnel to gain insights into work control effectiveness
- Review work control critiques

G. Improving the Modification Process

-Processes and practices utilized to develop engineering work packages

- Evaluate the quality of modifications when through the new modification process
- Monitor performance metrics on work orders on hold, (system engineering, design engineering)
- Evaluate engineering self-assessment results
- Talk to various engineers

-Engineering work on coordination studies for MCCs, load studies for 480 and EDGs

- Not scheduled for completion until end of year
- Evaluate number and quality and corrective action timeliness of condition reports or issue involving load study

H. Configuration Management Control Improvements

-Improvements to enhance plant configuration control process

- Evaluate CAP monthly metrics on implementation of corrective actions from 10 CFR 50.54(f) effort
- Evaluate thoroughness of design basis document development and relationship to corrective action process
- Discuss with field operators if any equipment that is operated in an abnormal configuration
- Performance metrics on temporary facility changes and Operator work arounds

-Complete FSAR verification, update design basis documents, validate upgrad critical setpoint values

- Discuss with cognizant individuals on status of implementing procedures (i.e. PM sheets for setpoint changes)
- Evaluate EOP training based upon changes to instrument setpoints
- Evaluate CAP monthly metrics on implementation of corrective actions from 10 CFR 50.54(f) effort

I. Increasing the knowledge level of plant design and licensing basis

- Inspect as part of baseline current operability determination quality
- Review CR causal trends on lack of design and licensing basis
- Evaluate the thoroughness and quality of SSFA on AFW system

J. Effectiveness Reviews

- Interview QA organization tasked with business plan effectiveness reviews
- Interview all responsible managers on how they measure business plan effectiveness

Briefing for Stakeholders:

NRC found that the short-term corrective actions taken in response to the problems highlighted during the February event were generally adequate. During the June 1, 2000, exercise, the emergency response organization demonstrated its ability to implement the onsite emergency plan. However, there continues to be weak performance of the Joint News Center regarding the dissemination of information to the media and public. Overall, we observed improvements in your emergency preparedness program, although the team identified some program deficiencies discussed below.

This report discusses three preliminary findings of low to moderate safety significance. The findings involved apparent failures to meet NRC emergency planning standards which contributed to the deficiencies exhibited during the Alert condition on February 15, 2000. These deficiencies consisted of:

- 1) an untimely augmentation by the emergency response organization contrary to 10 CFR 50.47 b(2);
- 2) an untimely accountability of onsite radiation emergency workers contrary to 10 CFR 50.47 b(10); and,
- 3) inconsistent dissemination of information to the public and a local official during the course of the event contrary to 10 CFR 50.47 b(7).

These findings were apparent violations and were assessed using the Emergency Preparedness Significance Determination Process as significant findings that were preliminarily determined to be White. White findings involve some increased importance to safety, which may require additional NRC inspection. The findings did not involve risk significant planning standards directly affecting the protection of public health and safety.

Also, the NRC identified six additional emergency preparedness findings involving failures to implement regulatory requirements. The findings were evaluated under the Emergency Preparedness Significance Determination Process as very low safety significance (Green). These findings involved violations of NRC requirements, but because they had been entered into your corrective action program and because of their very low safety significance, the violations were not cited. They are:

- two examples of plan changes that were considered to be decreases in the effectiveness of the emergency plan contrary to 10 CFR 50.54(q)
- inadequate emergency plan content on the description of the news center and equipment used for siren testing contrary to 10 CFR 50 App. E
- failure to correct ERO notification problems identified during drills contrary to 10 CFR 50.47(b)(14)
- failure to conduct off-hours exercise within six year period as required by the IP2 Emergency Plan which was contrary to 10 CFR 50.54(q).

- failure to activate the NRC's Emergency Response Data System (ERDS) within one hour of an Alert contrary to 10 CFR 50.72 (a)(4)
- failure to establish a communication line (ENS) line during the Alert event in a timely manner contrary to 10 CFR 50.72(c)(3).

The following areas were closed in the report indicating correction of the problem or improvement in the IP2 emergency preparedness program:

- exercise weakness due to overall poor performance in the TSC
- exercise weakness due to overall poor performance in the OSC
- ERO qualifications lapsed

Questions & Answers on the IP2 EP FU Inspection Report (05000247/2000-006)

1. Can you summarize the findings? In plain English?

A. See above.

2. What does it mean when you say "These findings were assessed..... as significant findings that were preliminarily determined to be "white" findings with some increased importance to safety..."

A. In accordance with the NRC's new oversight process, licensee input is offered before any final determinations are made on significance - thus, the term preliminary. If the final determination is that they are indeed "white" findings it means that the findings had some increased importance to safety, which may require additional NRC inspection. On a scale of 1 to 4 with 4 being the most significant, a white finding is at number 2, green is 1.

The licensee input would be factored into our final determination. The input would be focused on ensuring NRC has all the necessary and accurate facts to make the final determination on significance. The licensee input is not an opportunity for them to adversely assuage us or influence our decision.

3. Doesn't that mean this plant shouldn't restart before these issues have been properly addressed?

A. No. As noted in the cover letter of the inspection report we said: "The findings did not involve risk significant planning standards directly affecting the protection of public health and safety." Accordingly the findings are not tied to restart but they are important problems that need to be resolved.

3. What type of enforcement are you contemplating?

A. It is too soon to tell. A regulatory conference is being scheduled for early August 2000. In accordance with NRC enforcement policy dated May 1, 2000 (page 8 NUREG 1600) NRC uses colored findings depending on significance in the Oversight Process along with an Agency action Matrix in order to determine appropriate action. If violations that are more than minor are associated with these inspection findings, they will be documented and may or may not be cited depending on the safety significance. The more-than-minor violations are not normally assigned severity level, nor are they normally subject to civil penalty. However, violations associated with Actual Consequences, such as a failure to

make the required notification that impact the ability of Federal, state, and local agencies to respond to an actual emergency at the "site" and "general" level, may have a civil penalty associated with it.

At the regulatory conference, the licensee input would be factored into our final determination. The input would be focused on ensuring NRC has all the necessary and accurate facts to make the final determination on significance. The licensee input is not an opportunity for them to adversely assuage us or influence our decision in their favor.

4. Doesn't the new Reactor Oversight Process preclude fines for this type of issue? Are you assessing this plant under the old program or the new?

A. We are assessing the findings under the new program and fines are not precluded by the new program. See above.

In fact, the assessment and enforcement functions are now more in sync than ever before. All findings above Green significance may be subject to escalated enforcement which may involve civil penalties.

5. In addition to the "white" findings, you also list six additional findings involving failures to implement regulatory requirements. Taken as a whole, doesn't this mean this system is broken?

A. No. The other violations were determined to have Green significance. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. In the new oversight process we do not integrate Green findings as a part of the assessment process.

If needed:

WHITE findings indicate issues that are of low to moderate safety significance.

YELLOW findings are issues that are of substantial safety significance.

RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED.

GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections.

WHITE corresponds to performance that may result in increased NRC oversight.

YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight.

And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

6. You state that the additional violations were entered into ConEd's corrective action process. Is this the same process that failed to correct similar problems identified in August and September?
 - A. Yes, however, their corrective action process is improving as evidenced by improved performance in certain areas. Further, the Green findings documented in the EP followup report were violations at the time of the event on February 15-16, 2000. The report notes that a number of the green violation have been corrected or are well on the way to being corrected. The corrective action process at IP2 exhibits some weaknesses but it is resulting in some improvements.
7. How can we have confidence these issues will be addressed this time around?
 - A. Yes we have confidence because the inspection noted improvements being made in the emergency preparedness program. Some of the problems are so deep-rooted that it will take some time to resolve. Notwithstanding those problems, there is reasonable assurance that the licensee will take protective measure for public health and safety since there are no deficiencies associated with risk significant planning standards.
8. Don't all of these findings contradict the AIT findings and the discussion of EP at the AIT exit meeting? Why wasn't the public aware of these shortcomings before?
 - A. Not at all. The AIT report formed the factual basis for focus, follow-up, and determinations by the AIT followup and EP (emergency preparedness) followup inspection teams. Both teams were on site in overlapping weeks and there was a coordinated effort between both teams to segregate EP related problems and performance issues from the non-EP areas.

10. Did you develop these findings after the "ConEd internal memo" was brought to your attention?

A. No. The exercise of June 1st was the fulfillment of a commitment ConEd made to the NRC when weaknesses were identified shortly after the September 1999 exercise (IR 99-012). The commitment was for them to be subjected to another evaluated exercise by NRC staff before June 30, 2000. The June 30th date was provided by the licensee and was a reasonable date when program improvements would be made and sufficient training was conducted.

Although relatively new since September 1999, the program findings on augmentation, accountability, and operation of the Joint News Center were initially developed by the Augmented Inspection Team and followed up on by the EP follow-up team. In light of these new findings and the urgency of the matter, the licensee scheduled the evaluated exercise to be on June 1, 2000.

11. You already know evacuation is impossible, the steam generators are broken and now the emergency planning group has all of these problems. How can you even begin to consider allowing this plant to restart?

A. The focus of the EP follow-up report was on onsite EP performance and does not address offsite evacuation plan capabilities nor the problems with the steam generators.

Indian Point Unit 2 Potential Questions and Answers

Rev. C, 7/10/2000

Inspection Description

The inspection was conducted from May 15-26, 2000, and followed an NRC Augmented Inspection Team (AIT) review of the steam generator tube failure event that occurred on February 15, 2000. The Augmented Inspection Team (AIT) inspection was conducted immediately after the steam generator tube failure to promptly establish the facts associated with the event. The results of the AIT inspection is documented in Inspection Report No. 05000247/2000-002. This inspection, the AIT Follow-up inspection, was performed after Con Edison's initial recovery efforts, and focused on Con Edison's short term corrective actions and the enforcement aspects of the issues previously identified during the AIT inspection. As a result, many of the issues discussed in the AIT report are further discussed in this report. The cause of the tube failure was outside the scope of this inspection, and was being reviewed separately by the NRC. In addition, the emergency preparedness findings related to the event will be discussed in Inspection Report No. 05000247/2000-006.

Inspection Findings

Base on the AIT Follow-up inspection scope, the NRC concluded the short term corrective actions, taken in response to the February 2000 event, were adequate. While a majority of the issues were previously discussed in the AIT report, the NRC noted additional findings associated with weak corrective actions in operations and engineering support during this inspection. These additional findings, which included problems in restoring the remote start capability of gas turbine No. 2 and 3, did not change the overall conclusions developed in the AIT report. The inspection identified seven green issues, which were determined to be non-cited violations and to be issues of very low risk significance.

Potential Q&As

1. Why did the NRC document the EP issues in a different inspection report?

ANS: Since different NRC organizations and different Cornerstones are involved it was decided to issue separate inspection reports so the issues could be reviewed concurrently.

2. When will the EP report be issued?

ANS: The EP report is going through final internal review and is scheduled to be issued within the next week or two.

3. When will the NRC finish their review of the cause for the SG tube failure?

ANS: The review is currently in progress and is being coordinated with the NRR Safety Evaluation. It will probably be issued within the next few weeks.

4. What does a Green finding mean?

ANS: GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. It requires that the issue be addressed by the licensee's corrective action program.

5. Why are the findings considered "very low risk significance" when there is large number (7) green findings?

ANS: We consider the problems on an individual basis when we apply our significance determination process (SDP) to determine the risk significance and associated color. The SDP

Indian Point Unit 2 Potential Questions and Answers

Rev. C, 7/10/2000

process used to evaluate each issue, when assessing the impact each issue associated with the steam generator tube failure event, concluded that the risk was very low (Green findings). The cross-cutting section of the report provides a means to group common issues together and determine if we see an adverse trend in a specific area that should be addressed by the utility.

6. Will the NRC allow IP2 to restart with seven green findings and emergency preparedness problems?

ANS: Since GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections they are not findings that would cause the NRC to prevent restart. Based on the significance of the findings, the corrective actions taken by the licensee to date, the training the licensee has conducted in the EP area, and on the results of recent EP drills there are currently no unresolved EP issues that would cause the NRC to not allow restart. An overall Safety Evaluation is currently being prepared by NRR regarding the Steam Generator Tube Failure Event. The results of this SE could have impact on when IP2 can restart.

7. Were the problems associated with the seven green findings corrected?

ANS: All seven problems were entered into Con Edison's corrective action program and corrected. The NRC reviewed each of these items and determined that the problems were evaluated and corrected satisfactorily.

8. If the NRC observed ineffective corrective actions related to some problems, how many other problems exist at the plant due to ineffective corrective actions?

ANS: We did identify a few problems that were not satisfactorily resolved by Con Edison. However, a majority of the issues we reviewed were corrected satisfactorily. The problems we identified were entered into Con Edison's corrective action program. The Con Edison corrective actions for the items included a look at other similar issues that may also be a problem. When additional problems were noted they were entered into the corrective action process for resolution. Our reviews also determined that the problems in the corrective action program that are not completely resolved will not impact the plant restart.

9. What is Con Edison doing to fix the ineffective corrective action program?

ANS: A majority of the long-term actions to fix the ineffective corrective action program were identified in Revision 3 to the Recovery Plan that was docketed to the NRC by Con Edison on November 8, 1999.

The AIT follow-up inspection documented that recently a complete list of performance indicators were established by Con Edison to monitor the effectiveness of the corrective action program. Some improvements were noted in the timely resolution of problems. General, items that Con Edison has undertaken to fix the corrective action program include:

- Increase awareness for human performance deficiencies
- Industry visits to comment on human performance
- Reinforce Con Edison's management expectations for problem recognition and resolution
- Provide station wide guidance on Con Edison's expectations for timeliness of corrective actions
- Enhance training to reinforce problem initiation
- Improve guidance and training to effectively implement operability evaluations of problems identified.

Indian Point Unit 2 Potential Questions and Answers

Rev. C, 7/10/2000

10. The plant has had two significant events in the past 6 months, when will the next event occur? Why should we believe the next event won't cause more problems that could affect the safety of the local citizens and the environment?

ANS: The specific problems and issues related to both events resulted in Con Edison correcting a number of long term equipment, procedure, and process problems. Con Edison's detailed root cause analysis also highlighted additional areas for improvement that were corrected or will be corrected based on the significance of the issue. The ability of Con Edison to safely operate IP2 and protect the local public and environment will be a key part to our review of the plant issues prior to making a restart decision.

11. Did Con Edison make any personnel changes because of the plants recent poor performance?

ANS: Not to our knowledge. That's a question best answered by the utility.

12. If IP2 remains shutdown for the summer will the New York City area experience more unplanned power outages?

ANS: That will depend primarily on the weather and the availability of other electricity providers to the grid. This is not under the NRC's purview.

13. Why would the NRC allow the plant to restart if the Station Improvement Plan is not complete?

ANS: Con Edison management identified that there were a number of performance improvements to be achieved to avoid future significant challenges, such as experienced on August 31, 1999 event. Con Edison submitted the recovery plan update on November 8, 1999. NRC at that time and presently continue to monitor Con Edison's activities to ensure that plant operation can be conducted without undue risk to public health and safety. Failure to complete a station improvement plan prior to restart is acceptable if plant operations do not provide an undue risk to public health and safety. The NRC's restart decision will focus on Con Edison's ability to safely restart and operate the plant based on the current plant status and remaining open items. The AIT Follow-up Team reviewed the station improvement plan and determined that the problems discussed in the plan would not prohibit Con Edison from performing a safe restart of IP2.

14. Why did the plant have so many procedure problems? Are all of the problems corrected?

ANS: All of the procedure problems related to the steam generator tube rupture event were corrected by Con Edison and verified by the NRC to be satisfactorily resolved. The number of procedure problems were related to a backlog of procedure problems contained in a Con Edison computer data base. The significant procedure problems were entered into the Con Edison corrective action program to resolved based on the appropriate priority. The NRC review of the existing procedure problems did not note any deficiencies that would impact a safe plant restart. Also, some plant workers had a high tolerance to use procedures that did not exactly match the required job task. A corrective action report was written to address this issue. Part of the corrective action will include additional training on procedures and management emphasis for procedure adherence.

15. Will the NRC have a regulatory conference (enforcement conference) to discuss the report issues with Con Edison management?

Indian Point Unit 2 Potential Questions and Answers

Rev. C, 7/10/2000

ANS: We do not anticipate a regulatory conference in conjunction with the Augmented Inspection Team Follow-up Report.

16. Was the AIT Follow-up exit meeting open to the public? If not, why not?

ANS: No, the exit meeting was not open to the public. This was due to the fact that there were other public meetings to discuss the issues.

17. Will there be a public exit to discuss the NRC report findings.

ANS: See answer to 16 above.

18. Do the seven green findings represent that a large number of problems exist at the plant?

ANS: See answers to questions 5 and 7.

19. How can we get a copy of the AIT Follow-up inspection report?

ANS: A copy can be obtained by going to the NRC web site and accessing either ADAMS or the Indian Point web page under NRC Inspection Team Reports (<http://www.nrc.gov/NRC/REACTOR/IP/index.html>) or from the Region I Office of Public Affairs.

20. Is the NRC response to the SGTF event at IP2 different in the new inspection program compared to the previous program?

ANS: No, the response is basically the same. The report format and the characterization of the findings is different. For both the previous and new inspection programs the procedure for an Augmented Inspection Team is essentially the same.