

IP2 Lessons-Learned Task Group  
July 19, 2000. Discussion with Gary Holahan, DSSA

Task Group Members: Joe Donoghue, Alan Rubin

Applicability of SDP to IP2 Event

Gary understood that RI was using the NRR (Steve Long's) risk assessment as the basis for a RED finding under the Significance Determination Process (SDP). His view was that as long as there is an inspection finding that licensee deficiencies contributed to the event, then the SDP applies. It would not apply if the SGTR were a random event.

Categorization of SGTR as LERF

Gary provided material from NUREG 1493 (Fig. 5-20), several memos from RES describing SGTR release estimates (May 28, July 24, and August 30, 1996 all Ader to Jones), copies of SECY-88-273, and SECY-00-0078, and his own presentation concerning a Braidwood license amendment that considered releases from SG tube leakage. His perspective is that SGTR should be considered a LERF although there has been an issue regarding the timing of release in these sequences and whether that is consistent with the 'early' in LERF. In his recollection, the magnitude of release (i.e. size of the leak) has not been a central concern.

He mentioned a related issue for RIP 50 Option 3 screening criteria concerning the application of the CCFP of 0.1 for at least 24 hours after the accident. This considers the significance of the size of a release and its timing.

Gary wondered if a SGTR consequence assessment was part of the hearings held in the mid-1980s on disproportionate risk for Indian Point and Zion.

Impact of IP2 SGTR on Risk Perspective

Gary said it is not possible to prevent all SGTRs from occurring. He also agreed that the IP2 event does not appear to change the overall risk perspective for SGTRs.

Gary cited the NRR risk assessment and showed that the result (CDF) was in the same range as the ASP results related to past SGTRs at other plants. Indeed, several of the CCDP results were greater than the value estimated for IP2. Gary agreed that the event response did not appear to highlight any areas overlooked in previous analyses of the SGTR event.

Risk Communication

Gary remarked that although a clear depiction of the risk significance of the event should be provided to the public, the NRC staff should understand that the message may not be palatable to the public.

Industry Guidelines

Gary would not judge whether a licensee's use of the industry guidelines assured an acceptable level of SGTR risk at a plant. He explained that the recent agency experience with

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ANO-2 highlighted a more fundamental problem of relating tube structural integrity acceptance criteria to the risk of SG tube failure.