

Indian Point 2 (IP2) Steam Generator (SG) Tube Failure  
Lessons-Learned Task Group  
(TAC No. MA9163)

Task Group Notes - Discussion with Bill Dean on 8/10/00

Attendees: Scott Newberry, Tim Frye, Alan Rubin, Jimi Yerokun, Jack Goldberg

Background

Bill is the NRR Inspection Program Branch (IIPB) Chief and has responsibility for the inspection and assessment programs for commercial nuclear power plants

Results

- Bill felt that it is not the role of the inspection program to predict or prevent significant events. This is the licensee's responsibility. The inspection program is a sampling program only, and is intended to provide indications of declining licensee performance to allow the NRC to become more involved. There are other barriers in place apart from inspections such as the regulations and acceptable risk.
- When asked about the level of detail that's appropriate for the inspection program, Bill felt that inspection procedures should provide, where appropriate, well-understood requirements and objectives, but that in approaching a performance based methodology, there would be less prescription to allow inspectors to be able to delve into areas where performance deficiencies emerge.
- Bill described some of the detail of the self-assessment of the reactor oversight process that will be performed annually. Part of this self-assessment will be to solicit lessons learned from a variety of organizations, such as the Division of Engineering and the Events Assessment Branch. This will allow IIPB to look for holes in the program and risk-significant events that should be considered for inclusion in the program.
- Bill felt that the better inspection planning that is required by the new inspection program should address some of the issues resulting from the conduct of the 1997 NRC SG inspection. Risk-informing the inspection program results in better focus on the safety significant issues and requires more inspection preparation. The revised reactor oversight program has been designed to allow more time for inspection preparation, and require less time for documenting inspection results. This increased focus on inspection preparation should include reviewing the most recent technical documents and interacting with HQ experts. Bill felt that the NRR/licensee conference calls were a valuable way for the regions to prepare for their SG inspections.
- Bill noted that NRR inspection support has declined significantly in recent years, and that we may have moved too far away from supporting inspection. Regions need to have the ability to ask HQ for support. There are some technically oriented areas like SG tube degradation mechanisms, where the greater expertise in HQ should be used for inspections. Some inspection support from HQ in these type of situations may be worth considering and we should not have a zero inspection from HQ philosophy.

- Bill described the ownership of the inspection procedures (IPs) under the revised reactor oversight process. Under the old inspection program, various NRR branches owned the IPs. Under the new inspection program, IIPB owns all of the inspection procedures and will request support from the NRR technical branches when necessary. IIPB prepared a memo to the NRR technical divisions and branches outlining the IPs requiring their support.
- Bill discussed some thoughts regarding some of the Barrier Integrity performance indicators (PIs). He noted that some of the thresholds for the PIs, such as RCS Leakage, are not appropriate to indicate deviations from nominal performance (G/W threshold based on 50% TS limit). He also noted that the Division of Engineering had submitted an SDP like evaluation to evaluate SG inspection results. This tool would provide some guidance for how the NRC should be involved in the upcoming operating cycle based on licensee inspection results.
- Bill indicated that preliminary red finding for IP2 may be a conservative initial significance evaluation and may change once more dialogue occurs with the licensee. This was ok since the intent of the SDP is to complete a good risk assessment and get the issues into the public forum for licensees input for refinement.
- Bill felt that event response for the IP2 event was handled reasonably well. The agency did a good initial risk analysis to determine that an AIT was necessary. He noted that MD8.3 had been revised to include a risk matrix so that management no longer has to completely rely on deterministic criteria when deciding what level of response is required. The intent is that the new risk matrix tool in MD 8.3 will be used as an input in the decision making process.