

**From:** Wayne Schmidt  
**To:** Brian Holian, Daniel Holody, David Lew, David Nelson, Richard Urban  
**Date:** Mon, Jul 31, 2000 9:50 AM  
**Subject:** Re: IP2 violation

TS 4.2 and 50.55a requires that ASME section XI be used.

50.55a (b)(2)(iii) allows TS to be used in place of ASME Section XI IWB-2000 relative to the scope of the examinations.

UFSAR references TS 4.13

TS 4.13.C.1 requires a report to NRC on the proposed SG inspection 60 days prior to the scheduled examination.

In their submittal prior to the outage Con Ed makes statements about the qualification of the probes to the EPRI Guidance Rev 4 .

The other tie to Rev 4 is through :

10 CFR 50, Appendix B Criterion IX - Control of Special Processes, requires, in part, that measures shall be established to assure those special processes, including nondestructive testing, are controlled and accomplished using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

Paragraph 4.3 of Specification No. NPE-72217, "Eddy Current Examination of Nuclear Steam Generator Tubes, Indian Point 2," Revision 10 dated December 17, 1996, states, in part, "The examination technique shall be performed using qualified methods that are capable of detecting axial, skew, and circumferential cracking. The techniques used shall be qualified to the EPRI Steam Generator Examination Guidelines, Appendix H."

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