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From: Jack Strosnider *NLL*  
 To: Marsha Gamberoni *NLL*  
 Date: Mon, May 15, 2000 8:14 AM  
 Subject: Fwd: NRC Inspection on SGs

Marsha,

seems to me the attached request should have come through Projects - can DLPM take the lead on setting up the call? I'm not sure that I can support 1:00 today - there's something on my calendar about a meeting with NEI (subject not defined). Hopefully, I'll find out at this mornings staff meeting what it is and if I need to be there.

Jack

CC: Bill Bateman, David Lew, Edmund Sullivan, Richard Wessman, Suzanne Black

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**From:** David Lew *RI*  
**To:** Jack Strosnider *NRR*  
**Date:** Fri, May 12, 2000 1:34 PM  
**Subject:** NRC Inspection on SGs

Jack, I'd like to set up a conference call with you, Wayne Lanning and Randy Blough (and anyone else interested) on the NRC inspection of Con Edison's IP2 SG tube leak. I am proposing 1:00 pm on 5/15. If this is acceptable, I will set up a bridge for that time. While I have already had discussions with your staff on this inspection, it would be beneficial to ensure that we are all in agreement with the scope, participation and timing of the inspection, particularly in light of the lessons learned task group and NRR's SE for the IP2 SGs. It would be an opportune time to raise potential concerns and to ensure that the inspection is well coordinated. The below is a proposal for the inspection scope, participation and timing. Thanks, Dave. (Anyone else interested should let me know so I can get the time and bridge number to you.)

The purposes of the inspection are:

- (1) support NRR in the review of Con Edison's written answers to NRC questions through onsite verification of licensee assertions, as necessary and as directed by NRR.
- (2) assist NRR in the characterization of the 1997 steam generator performance issues by pursuing performance aspects as directed by NRR
- (3) identify potential enforcement issues associated with the steam generator tube leak
- (4) provide a mechanism to capture the risk significance of the event and to input potential findings into the assessment process of the reactor oversight program

The timing of the inspection:

Inspection will be initiated about the time that NRR receives of the information from Con Ed and will end shortly after NRR issues the SE on the steam generators. This would ensure that the inspection does not get ahead of the SE, yet provide a timely regulatory footprint on this risk significant event. I suggest NRR be on concurrence for this report to further ensure that the inspection does not get out of sync with the SE.

Inspection Staffing:

- (1) The onsite inspection will be staffed by Region I (which may include support from Caius Dodd, a contractor, and inspectors from other regions).
- (2) NRR will not provide onsite inspection support (to conserve resources and to remain focused on the SE). However, since NRR will be providing significant direction, guidance and assessment to the inspection effort, an NRR staff should be identify as an inspection member.

Other considerations:

An inspection would be a more efficient vehicle to address the divergent positions between the NRC and Con Ed on the 1997 steam generator eddy current inspection performance. While our preliminary view is that the tube leak was preventable, Con Edison has implied that their performance in 1997 was appropriate, i.e., they followed the EPRI guidelines and used the most advanced technology that was available at the time. The licensee's position is not unexpected given the scrutiny of the PSC and the potential economic consequences.

**CC:** A. Randolph Blough, Bill Bateman, Brian Holian, Edmund Sullivan, Emmett Murphy, Jefferey Harold, Marsha Gamberoni, Pete Eselgroth(...)