

From: Edmund Sullivan NLR
To: David Lew RI
Date: Fri, Feb 23, 2001 10:39 AM
Subject: Some additional thoughts for the letter

I didn't come up with any more thoughts for how to address Ken Craig affidavit. What Greg Cranston wrote is not what I recall and I didn't have time to relook at Ken Craig's piece. Greg said that the u bend restrictions were to the bobbin and what I thought Craig said is that they were to the Plus Point.

Anyway, I would like to suggest that you consider adding to the letter some text that I think goes to the heart of the issue. Here are some words that I came up with:

"Your denial of the violation implicitly asserts that the IP2 steam generator program was based on industry guidelines, normal industry practices and understanding of steam generator operating experience and that given such a program the occurrence of a tube failure should be beyond regulatory expectations of a licensee. This is not the case.

"Maintaining tube integrity has been and continues to be a responsibility of high safety and risk significance which, therefore, dictates that steam generator programs reflect a higher level of attention as warranted by the conditions present. The fact is that there were obvious conditions present in the IP2 SGs in 1997 that warranted attention in the form of corrective actions. These conditions included the high level of noise in the eddy current data, the history of denting, and evidence of a potential change in the level of denting. There was no evidence during our special inspection that any consideration was given in 1997 to these conditions or that any corrective actions were taken to address these conditions."

John SB

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