

From: Edmund Sullivan ^{NRR}
To: David Lew ^{DL}
Date: Thu, Feb 22, 2001 4:00 PM
Subject: Re: IP2 NOV Response Rev 7

David,

What would you think of the following: (Wayne may have to verify that this is true).

The statement that the "discovery of a single U-bend indication in the +Point inspection after prior bobbin coil inspections was not an unusual event after 16 EPFY of operation [and] was attributable to enhanced detection capability [rather] than accelerated tube deterioration during Cycle 13" was based on models used by the licensee's contractor to predict the occurrence of PWSCC that did not evaluate the inspection challenges faced and the evidence of increased denting at the upper tube support plates.

>>> David Lew 02/22 11:34 AM >>>

Ted,
See if this works. This would be the version without Ian's input. Note that I took out prescribe **in detail**, because we do not want to prescribe in detail or generally. Also, I don't quite like the next to last paragraph, because it throws the flow of the letter off. I also could not figure out a succinct way of taking on the hourglassing. If you have suggestions ...
Dave

>>> Edmund Sullivan 02/22 9:48 AM >>>

Dave,
Please listen to my voice mail on this subject. The reason for the adjustment to your wording is that I don't want to imply that all that is needed for tube integrity is what the existing TS state, i.e., plug tubes that you determine are defective and you are good for a cycle of operation. This is in stark contrast with the staff's restart assessment report and the new regulatory framework that we are working on with NEI.

Let's talk. Ted

>>> David Lew 02/22 7:32 AM >>>

Ted
Thanks for the comments. Very constructive. I think I understand the reason for your wanting to make the below statement, i.e., they should have done more to justify full cycle operation based on the existence of PWSCC, even if they identified all of the flaws that they reasonably could have.

Although the NRC considers that it was reasonable for you to have done so given these factors, these adjustments alone may not have been adequate to support a full cycle of operation before the next steam generator inspection.

However, in the context of this response and the way Con Ed has continually spun our statements, I not sure that we want to use this letter to convey that thought. Although it was a point made during the evaluation to justified continue operation of the old SGs, it was not a highlighted point that was specifically made in the inspection report and the cited violation. I suggest not including it in the letter.

Dave

>>> Edmund Sullivan 02/21 6:52 PM >>>

I + 1/3 SA

② M/27

David,

In your letter you say "we have concluded that no additional information was presented that would alter the NRC's conclusion that a violation existed." I think it would be more accurate to say "we have concluded that the information presented does not alter the NRC's conclusion that a violation existed." They did provide additional information - in fact it is information that was constructed after the fact and it was not their original basis for not taking corrective action.

I'd like to suggest some changes to a paragraph on the second page. The changes are in italics

"While the NRC does not intend to prescribe *in detail* what Con Edison should have done in response to the conditions encountered by Con Edison in 1997, the NRC believes that adequate evaluations and corrective actions in response to the significant identified conditions encountered and known industry information during 1997 *were not performed*. The high signal noise in areas susceptible to PWSCC (i.e., the low row u-bends) could have been accounted for in the inspection program. Adjustments could have been made to perform a more in-depth interrogation of available data associated with those susceptible areas or, if conditions prevented the detection of flaws, actions could have been taken to simply plug the potentially affected tube. These adjustments were *not considered* in 1997. *Although the NRC considers that it was reasonable for you to have done so given these factors, these adjustments alone may not have been adequate to support a full cycle of operation before the next steam generator inspection.* Therefore, your evaluation of these conditions and corrective actions at the time were not adequate and contributed to leaving tubes with PWSCC flaws in the low row tube in service, *one of which developed a large leak in February 2000.*

Toward the end of the letter you have the following sentence. " While we do not intend to address each of these, we have provided clarification of those statements that do not accurately represent NRC staff positions reflected in generic NRC documents." I think you should change "clarification of those statements" to "clarification of some statements" ...

Ted

>>> David Lew 02/21 4:43 PM >>>

Based on discussions with Dan Holody and Jim Luehman, I am providing you an advanced copy of the draft IP2 NOV reply. We are waiting input from the NRC contractor for attachment 1 to the letter, which is referenced in the next to last paragraph of the letter. This input is expected on Friday. In parallel, we are developing a replacement for the next to last paragraph in the event that we do not receive the contractor input. Nevertheless we plan to put the letter into concurrence by COB Friday. The goal is to have this signed Wednesday 2/28. Due to the short turnaround, we wanted to share the current draft of the letter.