

From: Louise Lund *NRL*
To: David Lew *RI*
Date: Fri, Oct 20, 2000 10:14 AM
Subject: Re: LLTG report

Thanks for your input. As I told Jimi yesterday, I admire folks that get into the fray and work things out. The ones that irritate me are the ones that wait until the report is final, and then tell you what you should have changed.

>>> David Lew 10/20 9:21 AM >>>
Yes ... again thanks for your patience.

>>> Louise Lund 10/20 9:10 AM >>>
I prefer option 1. Let me explain my reasons. I'm hesitant to reach conclusions that would not be supported by what the task group could have reasonably found or concluded.

As we mentioned in Section 6.3, the purchase specification in 1997 requested that the probes were to be capable to identifying defects in the presence of sludge and/or copper deposits, and should have structured their SG examination efforts accordingly. So, Westinghouse had knowledge of inspection challenges when they negotiated the contract. In the absence of any paper trail that we are aware of between Westinghouse and Con Ed on problems with the noise, it's not clear to us what the analysts were told or not told. We only know that they didn't make the calls that they should have been able to make in spite of the noise, and they didn't go on record making bad data calls out of a lot of the data from the U-bend and sludge pile regions.

In spite of the noise, it's not clear to us why Westinghouse missed flaws that were much easier to find than R2C5 - as we mention in our Section 6.3 - "Multiple existing indications of PWSCC in the row 2 U-bend area were missed. The Task Group concluded that this raised reasonable doubt as to the adequacy of the performance of the contractor providing the ECT data analysis service and Con Ed oversight of the 1997 SG examination activities."

The "conditions that increased the susceptibility to new degradation mechanisms", besides the age of the generators and denting, were discovered during the course of the examination, e.g., the restrictions to probe motion through the tube at TSP 6 and the U-bend flaw found during the examination. Another thing we could never nail down is at what point Westinghouse/Con Ed knew about R2C67. If R2C67 was discovered early on, that finding along with the noise problems and the probe restrictions should have caused the analysts to be cautious about the data analysis still ahead of them (slow down, be conservative, etc.). If R2C67 was discovered later on, that finding along with the noise problems and the probe restrictions should have caused the analysts to revisit the already reviewed data, especially if some of the data was questionable.

Therefore, we haven't had much insight as to what communication did exist between Westinghouse and Con Ed. Your second option infers something that we found about the communication between Con Ed and Westinghouse.

FYI - In our task group discussions, we were very concerned about the Westinghouse performance, especially since they provide this service at a number of other plants. We understand that Con Ed is ultimately responsible for maintaining an adequate SG management program, but the Westinghouse performance was especially troubling. Part of what Con Ed was buying from Westinghouse was their expertise level, which based on their footprint on the industry, could be expected to be greater than what any one licensee could have in this area. Westinghouse would have access to information about the conditions of many steam generators, and be able to trend data in a way that the individual licensees would not.

Handwritten notes:
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So..... after this overly long discussion (I apologize), I would be inclined to use your first re-wording option. Would this satisfy your concern?

Louise

>>> David Lew 10/20 8:00 AM >>>

As you requested yesterday, I thought about the characterization over night. How about these

Analysts may be placed in a position to determine if noise levels interfered with the ability to identify indications.

or

Analysts may be placed in a position to determine if noise levels interfered with the ability to identify indications, particularly if conditions which increase the susceptibility to new degradation mechanisms are not adequately communicated by the licensee.

Thanks.