From: William Dean NRR
To: Lew, David RI
Date: Thu, May 18, 2000 9:49 AM
Subject: Re: Indian Point 3 SG Inspection

Look forward to it.

>>> David Lew 05/18 6:38 AM >>>
Thanks. We will touch base with your staff as the inspection develops. By the way, the AIT report estimated CCDP at 1 e-4. When we have a performance issue, we will then enter the SDP and determine a CDF. My sense is that the two will be close.

>>> William Dean 05/17 5:25 PM >>>
The challenge will be in clearly annotating a performance issue of note that contributed directly to the increased risk profile - need to be focused on delta CDF by the way, not ccdp.

>>> David Lew 05/17 12:39 PM >>>
In conjunction with Bill Bateman's group, we are planning an inspection to focus on the Con Ed's performance in their 1997 eddy current inspection and the subsequent tube leak in Feb 2000. Since these findings will be developed now, the new program rules will apply. One of the keys will be whether there is a violation of requirements, since the steam generator inspection regulations are not specific. Even if there is no violation identified, we believe there is likely a licensee performance issue. If this is the case, I believe that we can still arrive at a finding based on licensee performance issues. Is my belief correct? By the way, the risk analysis has come up with a CCDP of 1 e-4.