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Subject: Draft Writeup

Here is my writeup from last week on enforcement actions for what it is worth.

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10 CFR 50, Appendix B Criterion XVI, Corrective Action, states that "(m)asures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management."

1) In 1997 Con Edison reported primary water stress corrosion cracking (PWSCC) at the apex of a low row, small radius U-bend tube for the first time. Contrary to Criterion XVI, the licensee failed to identify this finding as a significant condition adverse to quality, failed to determine the cause of the condition and failed to take corrective actions to preclude repetition.

2) In 1997 Con Edison encountered interference in the eddy current data in the form of base line noise but failed to recognize that it could mask significant PWSCC flaws. Contrary to Criterion XVI, the licensee failed to identify the level of noise as a significant condition adverse to quality, failed to determine the cause of the condition, and failed to take corrective actions to preclude repetition.

3) In 1997 Con Edison was required to identify significant flow slot deformation (hour glassing) at the upper support plates. Up to and during the 1997 inspection, Con Edison used visual observation to detect deformation. Contrary to Criterion XVI, the licensee failed to pursue the cause of PWSCC and, thereby, failed to implement measurement techniques capable of identifying flow slot deformation as a contributing cause of the PWSCC condition

10 CFR 50, Appendix B, Criterion IX, Control of Special Processes, states that: (m)asures shall be established to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specification, criteria, and other special requirements.

1) In 1997 Con Edison used inadequate techniques to identify flow slot deformation in the upper support plates of steam generators 22 and 23. Contrary to Criterion IX, the licensee failed to establish qualified procedures to adequately determine the extent of flow slot deformation (hour glassing) in the uppermost support plate flow slots in accordance with the requirements in the technical specification to report significant flow slot deformation.

2) In 1997 Con Edison Con Edison performed plus point eddy current testing of the steam generator tube low row U-bends. Contrary to Criterion IX, the licensee failed to use the proper calibration standard flaw size and phase rotation settings specified in the applicable qualification techniques sheet.

As a result of these violations, several flaws in steam generator tube low row U-bends were not identified and corrected in 1997, including tube R2C5 in steam generator 24 which failed on February 15, 2000.