

From: Timothy Frye, *NRP*
To: Lew, David, Schmidt, Wayne *RI*
Date: Fri, Aug 18, 2000 9:47 AM
Subject: Re: IP 2 SG IR for review

Wayne/Dave

Attached are IIPB comments.

Overall we felt this was a very well written report. Although there looks like a lot of comments, most are on format.

Call to discuss any of the comments

Understand commissioner TA brief might have an impact on issuing the report, but wanted to make sure you saw our comments as early as possible

>>> Wayne Schmidt 08/15 6:35 PM >>>

Please find attached the IP2 SG inspection, this is a very large file due to the included graphics (>4,000 K) if it causes you any problems let me know and I can zip it. Also attached is the Draft NOV.

We are looking to get this out by COB on Friday - anything you could do to support this would be appreciated.

If there are any questions or problems with anything about the report - please let me know ASAP.
610-337-5315

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IIPB comments on IP2 Special Inspection Report no. 2000-10

Comment: Not IAW IMC 0610* or other program guidance and change to the inspection report needs to be incorporated.

Suggestion: Recommended change to the inspection report which does not need to be incorporated in the report we reviewed but we would like to see incorporated in future reports.

Overall a very well written report

Cover Letter

- **(suggestion)** Add "Indian Point 2" to the subject line
- **(comment)** 4th paragraph - Should always discuss the significance of an issue first and then the compliance aspects. Move the sentence "These failures are an apparent violation of 10 CFR 50, Appendix B, Criterion XVI, Corrective Actions" to the end of the paragraph.
- **(comment)** 6th paragraph - The calibration issue is not being properly handled/documented. See additional comments. If it ends up being a URI, then it should not be discussed in the cover letter.
- **(comment)** 7th paragraph - Since there is only 1 apparent violation, do not discuss in the plural.

Summary of Findings:

- **(comment)** ADAMS template paragraph too long. Need to follow current guidance on this and limit the info to 256 characters (field size in ADAMS).
- **(comment)** Discuss the potential red finding first and go from most to least significant. Drop the "potential red" following "TBD". Use the words "preliminary red" in the last paragraph. Should add a little additional info (written by Steve Long) to this last paragraph of the red finding to describe why safety significant. Re-write the last paragraph, such as:
- "These matters were preliminarily determined to constitute a red inspection finding with high safety significance and a significant reduction in safety margin since the potential for a SG tube rupture event was significantly increased. Risk insights from the plants individual plant examination and other probabilistic risk assessments indicate that steam generator tube rupture events are a dominant contributor to the risk of public health and safety."

Also as discussed later, section should be 4OA2.1. Finally, this potential red finding needs to be listed under a cornerstone (barrier integrity?)

- **(comment)** TBD - Preliminary Green is not right for the improper calibration issue. This green finding can not be an apparent violation just because the licensee did not agree with the violation at the exit. AV is not appropriate for this issue since the safety significance (green) is not in question. This issue needs to be handled in one of three following ways:
 - 1) Green finding with NCV if licensee is taking appropriate corrective actions. Licensee can still appeal the NCV.
 - 2) Green finding with a NOV if the licensee is not taking appropriate corrective actions. Licensee can appeal the violation through the NOV process. (per OE would have to go through an enforcement panel before being issued like this)
 - 3) Green finding tracked as a URI if the NRC feels additional info is needed from the licensee before they can determine if there is a compliance issue. In this case the URI would not be discussed in the cover letter or summary of findings, but would be discussed in the body of the report.

Region and OE should decide which of the three is most appropriate.
- Third summary of findings entry should start with "No Color." and reference section 4OA2.2 (changed from 4OA2.1)

Report Details:

- **(comment)** 6th paragraph under Steam Generator History refers to 3.1 gpm prior to the failure. Should this be 3.1 gpd?
- **(comment)** List all three cornerstones under 1. Reactor Safety, then drop the cornerstone designations under each of the sections (1R1, 1R2, ...)
- **(comment)** Last paragraph 1R2.1, 1R2.2, and 1R2.3. Reads better to reword this as "The team's findings in this area relative to the licensee's corrective action program are further discussed in section 4OA1.1."
- **(comment)** 1R2.2 and others as appropriate. Should be "Issues and Findings" instead of "Observations and Findings"
- **(comment)** 1R3.1 - As previously discussed, it is not correct to call this an apparent violation just because the licensee disagrees that a violation occurred. It is a green finding, and as previously discussed, need to reword last paragraph as appropriate based on whichever of the 3 approaches the region chooses to take.
- **(comment)** 1R3.2 - Either need to make this a Green finding or delete if minor. Don't see any extenuating circumstances for documenting and it's not supporting any other findings

- **(comment)** 1R3.3 - Either need to make this a Green finding or delete if minor. Don't see any extenuating circumstances for documenting and it's not supporting any other findings. If keeping as a green finding, then move most of the scope writeup (except for first sentence) under "Issues and Findings" since this info is not scope
- **(comment)** 1R4.2 - Add a sentence to the end of the last paragraph that says something like, "As noted in Attachment 2, this results in an issue of high safety significance (red) as determined by the SDP." Need this sentence to draw the writeup to a conclusion.
- **(comment)** 4OA1 - Rename 4OA2 Identification and Resolution of Problems (including the two subsections) since this section fits easily into the standard format.
- **(comment)** 4OA1.1 - Reword the last paragraph to first talk about significance and then compliance. This reads easier and is also keeping with the tenets of the ROP that we are no longer compliance oriented, but safety focused, with enforcement a result of the SDP. Similar to summary of findings comment, add an additional sentence to further explain the safety significance. Reword something like:

Using the Reactor Safety SDP as documented in Section 1R4, the team's preliminary evaluation was that this is a red finding of high safety significance with a significant reduction in safety margin due to the increased risk of a SGTR. Risk insights from the plants individual plant examination and other probabilistic risk assessments indicate that steam generator tube rupture events are a dominant contributor to the risk of public health and safety. In accordance with NRC Enforcement Policy and Reactor Safety SDP, this matter is considered an apparent violation of 10 CFR 50, Appendix B, Criterion XVI, Corrective Actions. **(AV 50000247/2000-010-02; EA 000-179)**

- **(comment)** 4OA1.2 - Delete the second paragraph under "Issues and Findings" if this is minor and not a green finding. Don't see any extenuating circumstances for documenting and it's not supporting any other findings.
- **(comment)** 4OA2 - Rename 4OA6 since this section fits easily into the standard format.