EX 6

From: Marc Ferdas
To: David Lew, Edmund Sullivan, GWIA[tees@[redacted]] Stephanie Coffin
Date: Tue, Feb 20, 2001 11:52 AM
Subject: Re: IP2 RESPONSE

Conference Call today 1 pm. to discuss status and strategy of addressing NOV denial response.

301-231-5539 pass code [redacted] or 1-800-364-5642 EX. 2

If you have any questions please let me know

Thanks
Marc Ferdas
610-337-5084

>>> David Lew 02/20 10:50 AM >>>
Ian, I'm a little lost ... I was led to believe that there was a lot of information out there that noise can interfere with detection. While they are not explicit requirements, they fall within the "reasonableness" judgement that a Licensee should have known, been alert for and take Criterion XVI actions as necessary. Can you, HQs (Ted, Emmett and Stephanie) and I get together at 1:00 p.m. east coast time to discuss. Bridge number to follow.

Marc, Please make arrangement for the bridge number st 1:00 unless we hear back that it is not good. Thanks.

EX. 6

>>> "Ian Barnes" <tees@[redacted]> 02/20 9:48 AM >>>
After protracted review of all relevant documents, I have finally reached the individual conclusion that the best course of action for Region I would be to finalize the existing draft letter using the alternative paragraph to Attachment A. In summary, my rationale for this view is that the NRC pushed the envelope for a Criterion XVI violation (which by the way I think should have been done) in that there were no defined Code or standard requirements with respect to noise in 1997 and accordingly there was no explicit violation of NRC regulations. Compounding my dilemma in preparing a response was the handling in the inspection report of the noted programmatic deficiencies, which would be interpreted by an outside organization as a "no never mind" issue. Additional thoughts that come to mind are: (a) the steam generators have been replaced at IP2; (b) Revision 6 of the EPRI PWR Steam Generator Examination Guidelines is going to address data quality requirements which is a major step forward, if adequately accomplished, and confirms the value of performing the IP2 inspection; and (c) what purpose would be accomplished by belaboring individual comments in the licensee response?

I will forward you today more detailed comments on my rationale. I apologize for the procrastination but believe from my review that the best course of action would be to finalize correspondence on this issue as tersely as possible.

Ian Barnes

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