

CORR: 00-0037

Merrifield
CORR: 00-0037

COMMISSION CORRESPONDENCE

Correspondence Response Sheet

Date: March 9, 2000

Approve with edits.

To: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield ✓

[Signature]
3/9/00

From: Annette Vietti-Cook, Secretary

Subject: Letter to Sandra R. Galef, New York State Assembly,
concerns the steam generators at Indian Point 2

ACTION: Please comment/concur and respond to the Office of the
Secretary by:

Time: 4:00 p.m.
Day: Thursday
Date: March 9, 2000

Comment: RESPONSE ADVISES OF A MEETING TO BE HELD
ON MARCH 14

Contact: William Ruland, EDO/RI
610-337-5376

Entered in STARS Tracking System Yes No

W/14



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CHAIRMAN

The Honorable Sandra R. Galef
New York State Assembly
Room 540, Legislative Office Building
Albany, New York 12248

Dear Assemblywoman Galef:

This letter is in response to your February 18, 2000, letter in which you requested that the Nuclear Regulatory Commission (NRC) conduct a ~~timely~~ thorough examination of the past and current condition of the steam generators at the Indian Point 2 (IP2) Nuclear Plant following the steam generator tube failure on February 15, 2000. You also were concerned that local officials were not promptly informed of the Alert declared during the event. x

The NRC formed an Augmented Inspection Team (AIT) at IP2 to determine what happened prior to, during, and following the February 15, 2000, steam generator tube failure. As part of its review, the AIT will determine whether ConEd met its commitments for inspecting, maintaining, and monitoring steam generator tubes. In addition, the AIT will review ConEd's implementation of emergency plan notification requirements. We will provide you a copy of the AIT report as soon as it is completed. x

In addition to the AIT review, the Office of Nuclear Reactor Regulation (NRR) is conducting a review of the IP2 steam generators which will focus on steam generator inspections, problem identification, root cause analysis, and corrective actions. Through these efforts, NRC will review the results of the detailed examinations of the IP2 steam generators being performed by

ConEd. NRC met publicly with ConEd on March 1, 2000, to discuss steam generator inspections, recovery plans, restart criteria, and the replacement steam generators.

→ (Since this paragraph pertains to IP2-specific information, it should precede the more generic discussion)

Operating experience to date has shown that significant steam generator tube leakage and tube failures have all involved only one steam generator tube at a time. As you observed, there have been some concerns raised about the probability and consequences of multiple steam generator tube failures. Studies conducted by the NRC staff to date indicate that the potential for multiple steam generator tube ruptures is low. Additional studies have shown that even in the event of multiple steam generator tube ruptures, the likelihood of core melt is very low.

The NRC requirements for the operation of steam generators, ~~which~~ include limitations on steam generator tube leakage during plant operation. The measured leak rates prior to the event were well below plant technical specification limits. Commercial nuclear power industry experience to date has shown that steam generator leakage at the low levels noted at IP2 prior to the February 15, 2000, event is not considered predictive of a tube failure. However, as noted above, when the root cause of the steam generator tube failure at IP2 is understood, the NRC staff will review ConEd's corrective actions to ensure that those actions minimize the potential for recurrence. X

NRC requirements are intended to ensure the structural and leakage integrity of steam generator tubes. NRC does not have requirements for the timing of steam generator replacements. Licensees, in this case ConEd, decide whether or not to replace their steam generators based on the increasing costs of inspections, repairs, and lost operating time to continue to meet NRC requirements.

Notifications required for events such as the February 15, 2000, steam generator tube leak are prescribed in federally-required emergency response plans established for each nuclear power plant. Coordinated but separate plans are established for government organizations involved in offsite response around each plant. Based on our review to date, our understanding is that

ConEd made the notifications of offsite officials ~~specified in its "Emergency Response Plan for~~ ^{in accordance with its emergency response plan.}

~~Indian Point Unit Nos. 1 and 2~~ that are required immediately after the declaration of an Alert.

These notifications are federally required because they notify offsite emergency response organizations about the need to implement their plans. However, ConEd may not have been timely in making several additional notifications that it committed to make to local municipal officials. We are still reviewing this matter to better understand the concerns raised by the local officials.

Notifications of municipal officials of events at IP2 are prescribed in the local County Radiological Emergency Response Plans. Jurisdiction at the federal level for the review and approval of such offsite emergency response plans rests with the Federal Emergency Management Agency (FEMA). ConEd officials have informed us that they intend to work with New York State, local counties and municipalities, and FEMA, as appropriate, to review lessons learned from this event. This will include an assessment of the notification process. We will provide support to this effort as needed.

In closing, the NRC has a number of ongoing actions regarding this event. Based on the findings of the AIT and the review by NRR, we will take appropriate actions necessary to ensure that adequate safety margins exist. We plan a variety of activities to aid communities surrounding IP2 in understanding the event and our findings. For example, the AIT exit