

* may not have met 3AP
 even if they fixed "should haves" ~ 6 tubes plugged
 because could have had tubes 65% or so -

Jack S (17)
 Provided to group 7/5

SD - issue for Restart

INDIAN POINT 2 LESSONS LEARNED

TS says 40% (although we told them this is suspect)

* IP is much worse than others

LESSON LEARNED	RECOMMENDED INDUSTRY ACTION	RECOMMENDED NRC ACTION	COMMENTS
Action needs to be taken to ensure <u>appropriate quality of steam generator inspection data</u>	1) Management attention by licensees, and 2) Review and modification, as necessary, to plant specific procedures and generic industry guidelines	1) Include inspection data quality in regional inspections and in HQ reviews ↳ <u>licensing oversight/monitoring?</u>	Intended to address root cause of failure
Increased attention is necessary when " <u>new</u> " types of degradation are found during a steam generator inspection	1) Licensee management should provide increased attention to "new" types of degradation, 2) Licensees should perform root cause evaluations and take corrective actions for "new" types of degradation, and 3) Plant specific procedures and industry generic guidelines should be reviewed and modified as necessary to assure management involvement, root cause evaluations, and corrective actions	1) Regional inspections and HQ reviews should include assessment of "new" forms of degradation and adequacy of licensee root cause and corrective actions	Intended to address issue of understanding and taking appropriate action to manage "new" degradation mechanisms e.g., U-bend cracking and influence of denting/hourglassing. "New" refers to a mechanism occurring for the first time in the SG under inspection - similar degradation may have occurred previously in other plants or steam generators

J
 17/5

SERs prepared by NRC should clearly state the bases for the conclusions reached and clearly identify licensee information <u>not</u> relied upon as part of the bases	NA	1) Provide guidance to reviewers on preparation of SERs	Based on RES review of NRR SER related to extending IP-2 inspection schedule
Substantial limitations exist in the ability to quantify crack growth rates.	1) Industry guidelines for performing operational assessments should be reviewed and modified, as necessary, to assure that uncertainties associated with quantitative estimates of crack growth rates are appropriately considered and that operating experience is used to assess their reasonableness	1) Staff should be cautious in crediting quantitative estimates of crack growth rates and should utilize prior operating experience to assess their reasonableness	Based on RES review of NRR SER related to extending IP-2 inspection schedule
Vendor / licensee interface?	<u>Management oversight?</u> *	Not clear how we get to this - probably thru Licensee Management	
Limitations of ECT for condition monitoring?	Review guidelines relative to in-situ testing	Jack comment - might not be pertinent to IP	
Other management oversight issues?			

* Region may focus on this is major element of root cause - Jack not totally in agreement