

From: Jack Strosnider
To: Allen Hiser; Andrea Lee; Bill Bateman; Brian Sheron; Farouk Eltawila; Jacob Zimmerman; John Zwolinski; Keith Wichman; Lawrence Burkhardt
Date: 11/1/01 8:11AM
Subject: CRDM ORDER

Following up on yesterday's discussions regarding the plant specific paragraphs for the orders and the issue of the bases for the 12/31 date, see the attached proposed plant specific paragraph. This paragraph was drafted to address Surry 2. The bullets would have to be adjusted for the plant specific situation for Davis Besse. Also, I would suggest that this discussion go at the very end of Section II of the order.

Also, per discussions with Brian yesterday, I'd suggest that we not make the order immediately effective. I think it would be better in the long run for us to be able to say that the licensee had hearing rights, if they wanted to exercise them.

Jack

B-84

Surry 2

NRC Bulletin 2001-01 requested that licensees with plants in the high susceptibility to cracking category whose inspection plans did not include performing inspections before December 31, 2001, provide their basis for concluding that applicable regulatory requirements would continue to be met until their inspections are performed. The licensee's August 31, 2001 response to the bulletin proposed to perform inspections at Surry Unit 2 in March 2002. Based on the information provided in the licensee's bulletin response, industry operating experience and staff evaluations (reference technical assessment document), there are several facts that do not support the licensee's proposed inspection date of March 2002. Specifically,

- the reactor vessel head penetrations at Surry Unit 2 have not been inspected in the life of the plant in a manner that would provide reasonable assurance that cracking would be detected,
- the plant is in the high susceptibility to cracking category which means that there is a high probability that cracking exists in the Surry vessel head penetrations,
- staff evaluations indicate that, absent inspections that are capable of detecting vessel head penetration cracks, cracks will grow, in time, to present an unacceptably high probability of failure,

Based on the above, the licensee has not provided adequate justification for not performing inspections at Surry Unit 2 prior to December 31, 2001. Inspections conducted during 2001 at other high susceptibility plants have identified significant cracks in reactor vessel head penetrations. Identification of these cracks during the 2001 inspections allowed for timely corrective actions by the licensees. Based on the inspection experience to date, it is the NRC staff's best judgement that inspection of the Surry Unit 2 vessel head penetrations, capable of detecting cracking, should be performed before December 31, 2001. Considering the inspection experience to date, but also recognizing the uncertainties associated with this cracking phenomenon, December 31, 2001 is considered a reasonable schedule for performing these inspections.