

From: Jacob Zimmerman  
To: Burkhart, Lawrence - NRR  
Date: 10/19/01 12:21PM  
Subject: Re: BULLETIN 2001-01

Larry,

It looks fine to me. I spoke to Jack Strosnider about these issues and he thinks the email is a good idea.

Jake

--- >>> Lawrence Burkhart 10/19/01 11:08AM >>>  
Guys,

This is my first cut at the e-mail to send to John Z. Please provide feedback.

The following are some thoughts (based on conversations with Jake and Allen) on the status of resolution of this issue for Davis-Besse, D.C. Cook 2, and Surry 2:

EMCB is working on a technical justification regarding the time it takes to reach a critical circumferential crack size in a vessel head penetration (VHP) assuming an initial crack size (and crack growth rate) that may have existed with no visual indications at a prior visual inspection. This effort is important to resolve because it will enable the staff to present its technical argument and bases regarding its assumptions of crack growth, etc. However, the results of this effort will only help in resolving the "acceptability" of Davis-Besse's response because Davis-Besse is the only plant of the 3 that has performed a qualified visual inspection at its last outage (this inspection did not cover 4 VHPs at the top of the head and was conducted in March of 2000).

D.C. Cook 2 only completed an eddy current test of the ID and we, therefore, cannot give them credit for a qualified exam. Surry 2 has not completed a qualified visual inspection ever. Therefore, no matter the result of EMCB's efforts on this issue regarding the time it takes to reach a critical circumferential crack size, we will not be able to resolve the acceptability of D.C. Cook 2's and Surry 2's responses based on the technical argument that EMCB is working on now. Perhaps a risk argument could be made - I don't know. However, if one bases his argument only on the deterministic technical argument re: crack growth rate the result would be that D.C. Cook 2 and Surry 2 should perform the qualified visual inspection immediately.

Also, the idea of arguing the delta in risk between 12/31/01 and some other date (1/19/01 for D.C. Cook 2) doesn't seem appropriate because the 12/31/01 date does not have any technical basis (based on the technical argument alone re: crack growth, 12/31/01 is not acceptable for D.C. Cook 2 or Surry 2). I have been told that it was chosen to address the issue in the near term while allowing the licensees enough time to adequately plan and perform an outage and inspection.

Perhaps a meeting with management from DE, DSSA, and DLPM would be appropriate prior to the staff presenting its position (re: crack growth rate) to Davis-Besse/Robinson/the public in the meetings that are scheduled for next Wednesday. Such a meeting may also help resolve how we integrate the actions to be taken re: D.C. Cook 2 and Surry 2 with the results of EMCB's technical analysis.

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