

**From:** Brian Sheron  
**To:** Allen Hiser; Andrea Lee; Bill Bateman; Farouk Eltawila; Jack Strosnider; Jacob Zimmerman; John Zwolinski; Keith Wichman; Lawrence Burkhart  
**Date:** 11/8/01 4:02PM  
**Subject:** Re: PROPOSED ORDER

-NRR

NRC only requires "reasonable assurance."

>>> Lawrence Burkhart 11/08/01 02:29PM >>>  
 Farouk, This is a resend as I did not copy all on my last response.

I agree. How about "...free of significant defects..."?

Also, keep in mind that if they satisfy the staff's concerns either by deciding to shutdown before 12/31/01 to perform the inspections or performing the recommended inspections to the staff's satisfaction (as other licensee's have done) after the order requires shut down, the staff can rescind the order (and all stipulations contained within it).

Does anyone else have any comments on this issue?

Larry.

>>> Farouk Eltawila 11/08/01 02:18PM >>>

RES

I've a concern with the statement in the order and the memo to the EDO that says: "...each licensee must demonstrate to the NRC that the VHP nozzles are free of defect...". In my opinion, this is unattainable giving the capabilities of the inspection methodologies.

When a utility perform visual inspection and identify potential for leakage, volumetric examination or other methods are used to ascertain if there is indeed a crack that must be repaired. If my memory is correct, volumetric examination did not identify the circumferential cracking at ONS; they were discovered after grinding for repairs. Accordingly, the inspection proposed by the bulletin does not guarantee that VHP nozzles are **free of defects** as implied in the order and the memorandum to the EDO. I believe that if a utility has to demonstrate that VHP nozzles are free of defects, they must grind the suspected locations to see if there are cracks that they could not detect by volumetric examination.

I suggest the staff must use language that does not set the bar so high that no one can meet.

**CC:** Giovanna Longo; Mitzi Young

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