

New York State DPS  
3 Empire State Plaza  
Albany, NY 12223

Ms. Louise Lund  
US Nuclear Regulatory Commission  
Rockville, MD

Dear Ms. Lund,

On October 10 of this year, Caius Dodd forwarded to you a message in which I asked for NRC assistance in obtaining some documentation in support of a prudency investigation being conducted by the New York State Department of Public Service. One of the objectives of this investigation is to determine whether probes used for the 1997 eddy current inspection of the U-bends at IP2 were the best available at the time, and whether the probes reported to NRC as having been used, were in fact the probes that were used for the inspection. As I indicated in my request to Caius, I have uncovered some ambiguities, if not outright discrepancies in the Westinghouse and Con Edison documentation showing which probes were used in 1997. Mr. Dodd's own recollection of events also differs from official Con Edison reports to NRC.

As the original inventor of the Plus Point coil, I am uniquely aware of the subtle advantages and disadvantages offered by different commercially available versions of this coil. I personally oversaw the mechanical and electrical refinements of Zetec's rotating U-bend probes, including the mag-bias and non-mag-bias versions of the plus point U-bend probes, during my employment at Zetec from 1984 to 1996. In addition, I personally added these probes to the published Zetec probe catalog in 1995. In light of this, and in light of the discrepancies I have found, I feel it is imperative to establish whether or not mag bias probes (which are specifically designed to suppress signal interferences caused by magnetic deposits) were actually used in 1997. If mag-bias probes were not used, I submit that the tube rupture in 2000 may have been avoidable if the probe had been used.

In support of the recent IP2 investigation being conducted by NYSDPS, I have located an October 20, 2000 email from you (using ADAMS) discussing your own similar concern over Westinghouse's probe selection in light of known deposits (copy attached). Though several years have passed (our investigation was delayed, in part, by the events of September 11), I am compelled to ask again for your assistance in determining once and for all what probes were actually used for the inspection. Specifically, the Westinghouse purchase records, Zetec final inspection records, Zetec shipping records, and Zetec certificate of compliance (if created) for the period prior to and during the 1997 eddy current inspection would be most helpful (approx. January to June, 1997).

Zetec's response to my direct request for this information involved a requirement that the original customer (Westinghouse) give permission for the release of documents, along with a purchase order from Westinghouse to cover the unspecified cost of searching for these archived documents. I am confident I would receive neither. I am hopeful that a direct request from NRC for the same information (assuming there is interest at NRC) might cause Zetec to allow an exception to their customer confidentiality policy.

Please advise whether you would agree to support such a direct request for information from Zetec. If you agree, I have been informed that the proper contact is Bob Vollmer, who can be reached at (425) 392-5316.

Thank you in advance for your consideration in this matter.

Best Regards,

Jay Zimmerman  
New York State Department of Public Service  
(914) 827-7677