

## GROUP B

FOIA/PA NO: 2015-0413

### RECORDS BEING RELEASED IN PART

The following types of information are being withheld:

- Ex. 1:  Records properly classified pursuant to Executive Order 13526
- Ex. 2:  Records regarding personnel rules and/or human capital administration
- Ex. 3:  Information about the design, manufacture, or utilization of nuclear weapons  
 Information about the protection or security of reactors and nuclear materials  
 Contractor proposals not incorporated into a final contract with the NRC  
 Other \_\_\_\_\_
- Ex. 4:  Proprietary information provided by a submitter to the NRC  
 Other \_\_\_\_\_
- Ex. 5:  Draft documents or other pre-decisional deliberative documents (D.P. Privilege)  
 Records prepared by counsel in anticipation of litigation (A.W.P. Privilege)  
 Privileged communications between counsel and a client (A.C. Privilege)  
 Other \_\_\_\_\_
- Ex. 6:  Agency employee PII, including SSN, contact information, birthdates, etc.  
 Third party PII, including names, phone numbers, or other personal information
- Ex. 7(A):  Copies of ongoing investigation case files, exhibits, notes, ROI's, etc.  
 Records that reference or are related to a separate ongoing investigation(s)
- Ex. 7(C):  Special Agent or other law enforcement PII  
 PII of third parties referenced in records compiled for law enforcement purposes
- Ex. 7(D):  Witnesses' and Allegers' PII in law enforcement records  
 Confidential Informant or law enforcement information provided by other entity
- Ex. 7(E):  Law Enforcement Technique/Procedure used for criminal investigations  
 Technique or procedure used for security or prevention of criminal activity
- Ex. 7(F):  Information that could aid a terrorist or compromise security

Other/Comments: \_\_\_\_\_

## **Karwoski, Kenneth**

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**From:** Karwoski, Kenneth  
**Sent:** Tuesday, March 31, 2015 7:15 AM  
**To:** Cothron, Helen  
**Subject:** RE: Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

Helen,

Let me check and I will let you know (hopefully within the next few days).

Ken

**From:** Cothron, Helen [mailto:HCothron@epri.com]  
**Sent:** Friday, March 27, 2015 11:28 AM  
**To:** Karwoski, Kenneth  
**Subject:** RE: Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

Ken, would you be free for a meeting on July 9<sup>th</sup>? This looks like the first opportunity that I and my vendor are both open.

**From:** Karwoski, Kenneth [mailto:Kenneth.Karwoski@nrc.gov]  
**Sent:** Thursday, March 26, 2015 1:00 PM  
**To:** Cothron, Helen  
**Subject:** Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

Helen,

During the February 12<sup>th</sup> meeting between the NRC and the SGTF representatives, we discussed the possible benefit of having a broad discussion of all the work that has been done on the divider plate and tube-to-tubesheet weld issue. In addition, during that meeting the industry could summarize their position/plans for an aging management program for these components.

We also indicated we would provide a list of specific topics/questions we wanted to make sure were also discussed during that meeting based on our review of the EPRI report, "Investigation of Crack Initiation and Propagation in the Steam Generator Channel Head Assembly." Below is a list of the topics/questions that we have identified to-date. If we identify anything else, I will let you know. The questions/topics are in no particular order.

The purpose of this e-mail is to determine whether you still can support such a meeting; and, if so, schedule a date/time for that meeting.

Thanks,

Ken  
301-415-2752

Some data were removed from the TTSW database because of the tungsten weld head positioning. Why were the data removed? What is the sensitivity of the results if these data were included?

What types of inspections are being referred to in Section 7.3? Are these inspections in accordance with the ASME Code or industry guidelines? Please discuss.

Summarize the inspection results for the Z-weld (tubesheet to shell weld)? Given the closeness of these inspections to the triple point, if something unexpected were to occur, would these inspections possibly give an opportunity to detect cracking were it to occur (e.g., detect leakage or boric acid residue during the performance of the inspection if a throughwall flaw had occurred as a result of divider plate cracking)?

Previously, the stresses within the tubesheet were assessed for cracks in the divider plate. For some steam generators, we believe no credit was given for the presence of the divider plate during the original design. For other steam generators (primarily replacements), some credit may have been given for the divider plates in reducing stresses within the tubesheet. Please re-summarize the analyses performed and their results.

Please clarify the operating experience with Alloy 82 with respect to its susceptibility to cracking. The NRC staff is under the impression that welds which have exhibited cracking may have been fabricated using both Alloy 82 and Alloy 182, and hence it cannot be conclusively stated that cracks have not occurred in welds fabricated from Alloy 82.

Please clarify the difference between normal cladding and a structural butter (refer to page 2-3).

On page 2-19, there is reference to a mockup from another utility. Please discuss whether inclusion of this data would affect the conclusions of this report.

Intergranular stress corrosion cracking was reported on both the hot- and cold-leg sides of the channel head at Dampierre. Please clarify where this cracking occurred on the cold-leg (in the tubes, in the divider plate, etc.). Refer to page 3-22.

This report potentially applies to all steam generators. On page 4-3, it was indicated that the model 51 steam generator was considered the most limiting steam generator. Given the current fleet of steam generators in operation in the U.S., is this still the case?

Discuss the applicability of the information in this report to once-through steam generators (recognizing there is no divider plate in once through steam generators)?

Page 4-5 reference a "Reference 0" report. What is the correct reference?

Page 5-17 (and page 5-1) implies that possible loose parts may result in steam generator channel head degradation (refer to Figure 5-26). Where was this degradation located (channel head cladding, divider plate, etc.). Please discuss the applicability of this report to plants in which loose parts have impacted the tubesheet cladding or divider plate complex.

The first and second paragraph on page 5-24 are not clear on what is necessary for the stress corrosion cracking to occur. For example, can cracking occur in a divider plate with no cold-working? Is cold-working considered a "fabrication defect?"

As a result of this effort, does the industry plan to make any recommendations regarding material or design considerations for the design of new (including replacement) steam generators?

**Karwoski, Kenneth**

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**From:** Karwoski, Kenneth  
**Sent:** Friday, April 17, 2015 9:15 AM  
**To:** Cothron, Helen  
**Subject:** RE: Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

I think that would be useful.

Did you want to try to schedule a conference call now or wait a few more weeks?

Ken

**From:** Cothron, Helen [mailto:HCothron@epri.com]  
**Sent:** Friday, April 17, 2015 8:57 AM  
**To:** Karwoski, Kenneth  
**Subject:** RE: Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

We plan to have the answers developed to your questions by mid June. Maybe we could set up a call to let you know how we plan to answer and get your feedback?

**From:** Karwoski, Kenneth [mailto:Kenneth.Karwoski@nrc.gov]  
**Sent:** Tuesday, March 31, 2015 2:34 PM  
**To:** Cothron, Helen  
**Subject:** RE: Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

Helen,

I do not expect any more questions. Also, although we want specific answers to those questions, we also want a broad discussion of the entire report and all the work done on this issue.

Let me know if you would like to discuss.

Ken

**From:** Cothron, Helen [mailto:HCothron@epri.com]  
**Sent:** Tuesday, March 31, 2015 2:26 PM  
**To:** Karwoski, Kenneth  
**Subject:** RE: Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

Ok, thanks. We are starting to get organized on the work to develop answers to your questions. Do we now have all the questions or should we expect more?

**From:** Karwoski, Kenneth [mailto:Kenneth.Karwoski@nrc.gov]  
**Sent:** Tuesday, March 31, 2015 1:22 PM  
**To:** Cothron, Helen  
**Subject:** RE: Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

Yes. Let's plan on August 13<sup>th</sup>. I will make sure it gets on the NRC attendees calendar.

Thanks,

Ken

**From:** Cothron, Helen [<mailto:HCothron@epri.com>]  
**Sent:** Tuesday, March 31, 2015 12:46 PM  
**To:** Karwoski, Kenneth  
**Subject:** RE: Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

August 13<sup>th</sup> will work best for us. Do you want to plan on that?

**From:** Karwoski, Kenneth [<mailto:Kenneth.Karwoski@nrc.gov>]  
**Sent:** Tuesday, March 31, 2015 10:20 AM  
**To:** Cothron, Helen  
**Subject:** RE: Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

Helen,

There is a potential conflict with one of the reviewers for July 9<sup>th</sup>.

Would it be possible to have the meeting on July 30<sup>th</sup>, August 12<sup>th</sup> or August 13<sup>th</sup>?

Thanks,

Ken

**From:** Cothron, Helen [<mailto:HCothron@epri.com>]  
**Sent:** Friday, March 27, 2015 11:28 AM  
**To:** Karwoski, Kenneth  
**Subject:** RE: Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

Ken, would you be free for a meeting on July 9<sup>th</sup>? This looks like the first opportunity that I and my vendor are both open.

**From:** Karwoski, Kenneth [<mailto:Kenneth.Karwoski@nrc.gov>]  
**Sent:** Thursday, March 26, 2015 1:00 PM  
**To:** Cothron, Helen  
**Subject:** Meeting on Tube-to-Tubesheet Weld and Divider Plate Cracking Report

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We also indicated we would provide a list of specific topics/questions we wanted to make sure were also discussed during that meeting based on our review of the EPRI report, "Investigation of Crack Initiation and Propagation in the Steam Generator Channel Head Assembly." Below is a list of the topics/questions that we have identified to-date. If we identify anything else, I will let you know. The questions/topics are in no particular order.

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Ken  
301-415-2752

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What types of inspections are being referred to in Section 7.3? Are these inspections in accordance with the ASME Code or industry guidelines? Please discuss.

Summarize the inspection results for the Z-weld (tubesheet to shell weld)? Given the closeness of these inspections to the triple point, if something unexpected were to occur, would these inspections possibly give an opportunity to detect cracking were it to occur (e.g., detect leakage or boric acid residue during the performance of the inspection if a throughwall flaw had occurred as a result of divider plate cracking)?

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Please clarify the operating experience with Alloy 82 with respect to its susceptibility to cracking. The NRC staff is under the impression that welds which have exhibited cracking may have been fabricated using both Alloy 82 and Alloy 182, and hence it cannot be conclusively stated that cracks have not occurred in welds fabricated from Alloy 82.

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Discuss the applicability of the information in this report to once-through steam generators (recognizing there is no divider plate in once through steam generators)?

Page 4-5 reference a "Reference 0" report. What is the correct reference?

Page 5-17 (and page 5-1) implies that possible loose parts may result in steam generator channel head degradation (refer to Figure 5-26). Where was this degradation located (channel head cladding, divider plate, etc.). Please discuss the applicability of this report to plants in which loose parts have impacted the tubesheet cladding or divider plate complex.

The first and second paragraph on page 5-24 are not clear on what is necessary for the stress corrosion cracking to occur. For example, can cracking occur in a divider plate with no cold-working? Is cold-working considered a "fabrication defect?"

As a result of this effort, does the industry plan to make any recommendations regarding material or design considerations for the design of new (including replacement) steam generators?

**Karwoski, Kenneth**

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**From:** Karwoski, Kenneth  
**Sent:** Wednesday, May 13, 2015 10:27 AM  
**To:** Cothron, Helen  
**Subject:** RE: August 13th meeting on Divider Plate/TTSWs

Thanks.

Ken

**From:** Cothron, Helen [mailto:HCothron@epri.com]  
**Sent:** Wednesday, May 13, 2015 10:26 AM  
**To:** Karwoski, Kenneth  
**Subject:** RE: August 13th meeting on Divider Plate/TTSWs

I'm checking with my vendor. He must be traveling today. He's not answering my call or email.

**From:** Karwoski, Kenneth [mailto:Kenneth.Karwoski@nrc.gov]  
**Sent:** Wednesday, May 13, 2015 5:53 AM  
**To:** Cothron, Helen  
**Subject:** August 13th meeting on Divider Plate/TTSWs

Helen,

Would it be possible to move the meeting on divider plate cracking from August 13<sup>th</sup> to July 30<sup>th</sup>?

One of the key reviewers may not be available on August 13<sup>th</sup>.

Thanks,

Ken  
301-415-2752

## Karwoski, Kenneth

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**From:** Karwoski, Kenneth  
**Sent:** Monday, June 01, 2015 7:53 AM  
**To:** Cothron, Helen  
**Cc:** Hiser, Allen  
**Subject:** RE: August 13th meeting on Divider Plate/TTSWs

Helen,

Thanks and sorry for the late reply. We will schedule it for July 30<sup>th</sup>.

Ken

**From:** Cothron, Helen [mailto:HCothron@epri.com]  
**Sent:** Monday, May 18, 2015 10:23 AM  
**To:** Karwoski, Kenneth  
**Subject:** RE: August 13th meeting on Divider Plate/TTSWs

We are ok with July 30<sup>th</sup>. We will plan for that.

**From:** Karwoski, Kenneth [mailto:Kenneth.Karwoski@nrc.gov]  
**Sent:** Wednesday, May 13, 2015 5:53 AM  
**To:** Cothron, Helen  
**Subject:** August 13th meeting on Divider Plate/TTSWs

Helen,

Would it be possible to move the meeting on divider plate cracking from August 13<sup>th</sup> to July 30<sup>th</sup>?

One of the key reviewers may not be available on August 13<sup>th</sup>.

Thanks,

Ken  
301-415-2752

B/y



**Karwoski, Kenneth**

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**From:** Cothron, Helen <HCothron@epri.com>  
**Sent:** Tuesday, June 16, 2015 8:45 AM  
**To:** Karwoski, Kenneth  
**Subject:** RE: Meeting Notice for Divider Plate/TTSW Meeting

Let me talk to the Lawyers. I would say we probably would want some of the details to be proprietary. I'll get back to you

**From:** Karwoski, Kenneth [mailto:Kenneth.Karwoski@nrc.gov]  
**Sent:** Monday, June 15, 2015 9:01 AM  
**To:** Cothron, Helen  
**Subject:** Meeting Notice for Divider Plate/TTSW Meeting

Helen,

We are starting to draft the meeting notice for the July 30<sup>th</sup> meeting on the Divider Plate and Tube-to-Tubesheet Weld report.

I noticed that the October 2014 report is proprietary (not publicly available).

Do you think portions of the meeting will have to be closed to the public?

At some point, if we revise our regulatory position on the divider plate and/or tube-to-tubesheet weld report, we will need a better understanding of what can and can't be released to the public (since we normally summarize our technical basis in a safety evaluation, the GALL report, and/or interim staff guidance).

If it will be easier to discuss, please let me know.

Thanks,

Ken  
301-415-2752

**Karwoski, Kenneth**

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**From:** Karwoski, Kenneth  
**Sent:** Monday, June 22, 2015 9:45 AM  
**To:** Cothron, Helen  
**Subject:** RE: RE: Meeting Notice for Divider Plate/TTSW Meeting

Helen,

Thanks! I will probably send you a copy of the meeting notice in the next few days for your review/comment.

Ken

**From:** Cothron, Helen [mailto:HCothron@epri.com]  
**Sent:** Monday, June 22, 2015 9:39 AM  
**To:** Karwoski, Kenneth  
**Subject:** [External\_Sender] RE: Meeting Notice for Divider Plate/TTSW Meeting

Ken, ERPI lawyers are against providing redacted versions of reports. This position has changed in the last couple of years. We used to provide redacted versions of reports. So, I am either going to make the report public or publish our meeting slides and make them public. This solves your first issue – the meeting doesn't have to be closed to the public.

If I am able to make the report public, that solves your second issue, so I'm going to try hard to make that happen.

**From:** Karwoski, Kenneth [mailto:Kenneth.Karwoski@nrc.gov]  
**Sent:** Monday, June 15, 2015 9:01 AM  
**To:** Cothron, Helen  
**Subject:** Meeting Notice for Divider Plate/TTSW Meeting

Helen,

We are starting to draft the meeting notice for the July 30<sup>th</sup> meeting on the Divider Plate and Tube-to-Tubesheet Weld report.

I noticed that the October 2014 report is proprietary (not publicly available).

Do you think portions of the meeting will have to be closed to the public?

At some point, if we revise our regulatory position on the divider plate and/or tube-to-tubesheet weld report, we will need a better understanding of what can and can't be released to the public (since we normally summarize our technical basis in a safety evaluation, the GALL report, and/or interim staff guidance).

If it will be easier to discuss, please let me know.

Thanks,

Ken  
301-415-2752

B/6

**Karwoski, Kenneth**

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**From:** Karwoski, Kenneth  
**Sent:** Tuesday, June 30, 2015 8:48 AM  
**To:** Cothron, Helen  
**Subject:** RE: RE: RE: Meeting Notice for Divider Plate Cracking Meeting

Helen,

Thanks.

We will issue the meeting summary in the next week or so.

Ken

**From:** Cothron, Helen [mailto:HCothron@epri.com]  
**Sent:** Tuesday, June 30, 2015 8:43 AM  
**To:** Karwoski, Kenneth  
**Subject:** [External\_Sender] RE: RE: Meeting Notice for Divider Plate Cracking Meeting

The first one is ok. The second one may be difficult, but we will think about how we can answer it. I'm ok with you putting the questions in the meeting notice.

**From:** Karwoski, Kenneth [mailto:Kenneth.Karwoski@nrc.gov]  
**Sent:** Tuesday, June 30, 2015 8:40 AM  
**To:** Cothron, Helen  
**Subject:** RE: RE: Meeting Notice for Divider Plate Cracking Meeting

I will leave the agenda as is (ending at 2 pm). It is OK if the meeting ends early.

Let me know if you are OK with the 2 additional questions being included with the meeting notice (with the other issues we sent you earlier).

Thanks,

Ken  
301-415-2752

**From:** Cothron, Helen [mailto:HCothron@epri.com]  
**Sent:** Tuesday, June 30, 2015 8:23 AM  
**To:** Karwoski, Kenneth  
**Subject:** [External\_Sender] RE: Meeting Notice for Divider Plate Cracking Meeting

This looks good. I got the two additional questions. If it is just our presentation with few questions, the morning may be enough. It is up to you. We could leave it at 2:00. It would be ok if we finish early, right?

**From:** Karwoski, Kenneth [mailto:Kenneth.Karwoski@nrc.gov]  
**Sent:** Tuesday, June 30, 2015 8:20 AM  
**To:** Cothron, Helen  
**Subject:** Meeting Notice for Divider Plate Cracking Meeting

B/7

Helen,

Attached is a draft of a meeting notice that we are preparing for the meeting on the divider plate/tube-to-tubesheet weld report for your review/comment. An attachment to the meeting announcement will include the questions/issues that we provided to you (see attached e-mail).

I did not know how much time you will need for your presentations. If you think that it will only take the morning, let me know and we can modify the agenda to reflect that the meeting will be over at noon.

Also, as we have been preparing for the meeting, we identified two additional questions that we would like to discuss (see below). Can we add these to the list of questions/issues we raised for you to address at the meeting or do you think you may need more time to address them? If the latter, we will just raise them in the meeting.

Thanks,

Ken  
301-415-2752

1. Some of the analyses performed in support of your assessments for divider plate cracking appear to assume 40 years of steam generator operation. Some units may operate their steam generators for a longer period of time, for example up to a maximum of 80 years of plant operation for subsequent license renewal. Please discuss which analysis were based on 40 years of operation and whether the conclusions would still be valid for steam generator operation for a longer period of time (e.g., up to 80 years or the maximum steam generator operating term for a plant license period of 80 years).
2. Because each plant has a unique set of design/licensing bases for their steam generators, did the analyses in this report address the limiting load levels from the entire range of design/licensing basis loadings for the population of plants that this report covers? For any design/licensing basis conditions that may have loads greater than those addressed in this report, please discuss how these greater loading levels would change the conclusions in this report, both for a fully degraded divider plate (through-wall flaw) and for one with less serious degradation.

## Karwoski, Kenneth

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**From:** Karwoski, Kenneth  
**Sent:** Wednesday, July 08, 2015 1:51 PM  
**To:** 'Cothron, Helen'  
**Subject:** RE: RE: Conference Call Prior to Meeting on Divider Plate Report

The 17<sup>th</sup> at 1 is fine. We can use your line.

Ken

**From:** Cothron, Helen [mailto:HCothron@epri.com]  
**Sent:** Wednesday, July 08, 2015 1:38 PM  
**To:** Karwoski, Kenneth  
**Subject:** [External\_Sender] RE: Conference Call Prior to Meeting on Divider Plate Report

Ken, the 17<sup>th</sup> looks good. Let's do it at 1:00 eastern time. I can set up a conference line – or do you need to do it?

**From:** Karwoski, Kenneth [mailto:Kenneth.Karwoski@nrc.gov]  
**Sent:** Wednesday, July 08, 2015 1:22 PM  
**To:** Cothron, Helen  
**Subject:** RE: Conference Call Prior to Meeting on Divider Plate Report

Helen,

It may be of some value to discuss the general approach. Unfortunately, I am not available on the 16<sup>th</sup>. Would it be possible to do it on Tuesday July 14<sup>th</sup> or Friday July 17<sup>th</sup> (sometime between 11 and 2)?

Ken  
301-415-2752

**From:** Cothron, Helen [mailto:HCothron@epri.com]  
**Sent:** Wednesday, July 08, 2015 12:28 PM  
**To:** Karwoski, Kenneth  
**Subject:** [External\_Sender] Conference Call Prior to Meeting on Divider Plate Report

Would you like to have a conference call where we can go through our approach to answer your questions.

My contractor and I are both available Thursday, 16<sup>th</sup> any time.

**Karwoski, Kenneth**

---

**From:** Cothron, Helen <HCothron@epri.com>  
**Sent:** Friday, July 17, 2015 3:19 PM  
**To:** Karwoski, Kenneth  
**Subject:** [External\_Sender] Re: Divider Plate Cracking Meeting

Gary Whiteman and possibly Herm Lagally will be available on the phone.

Sent from my iPhone

On Jul 17, 2015, at 1:34 PM, "Karwoski, Kenneth" <[Kenneth.Karwoski@nrc.gov](mailto:Kenneth.Karwoski@nrc.gov)> wrote:

Helen,

Allen and I just had a discussion regarding the upcoming meeting on July 30<sup>th</sup>.

Based on that discussion, we think that it may be a good idea if the industry had someone at the meeting who could speak to the phase 1 and 2 analyses performed by Westinghouse (even if they were just on the phone).

Let me know if you would like to discuss.

Ken  
301-415-2752

B/9

**Karwoski, Kenneth**

---

**From:** Karwoski, Kenneth  
**Sent:** Monday, July 27, 2015 5:25 AM  
**To:** 'Cothron, Helen'  
**Subject:** RE: RE: Divider Plate Cracking Meeting

Helen,

The phone number is: 888-469-2076.

The passcode is: (b)(6)

Ken

**From:** Cothron, Helen [mailto:HCothron@epri.com]  
**Sent:** Friday, July 24, 2015 2:47 PM  
**To:** Karwoski, Kenneth  
**Subject:** [External\_Sender] RE: Divider Plate Cracking Meeting

Gary Whiteman, Westinghouse will join by phone. Understand that this work was done by other engineers at Westinghouse that are now gone. If you have detailed questions about that work, we will have to get a contract in place and pay Westinghouse to get up to speed on that work and then answer questions. But if the questions are general enough, Gary should be able to answer them.

What is the phone number he should call?

**From:** Karwoski, Kenneth [mailto:Kenneth.Karwoski@nrc.gov]  
**Sent:** Friday, July 17, 2015 1:34 PM  
**To:** Cothron, Helen <HCothron@epri.com>  
**Subject:** Divider Plate Cracking Meeting

Helen,

Allen and I just had a discussion regarding the upcoming meeting on July 30<sup>th</sup>.

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B/10