# Union of Concerned Scientists

## FAX MESSAGE

| | |
|---|---|
| **TO:** | **Deb Katz, Citizens Awareness Network**<br>**Mark Jacobs, WESPAC** |
| **FROM:** | **Dave Lochbaum** |
| **DATE:** | **January 19, 2001** |
| **NO. PAGES (including cover sheet):** | **2** |

---

**I reviewed the IP2 Condition Report (CR) summaries. The bulk of the CRs involve problems typically reported by nuclear plant workers: burned out light bulbs, equipment failures discovered during testing, etc.. There were several CRs that suggest broader, systemic problems. Those CRs are:**

1. **CR 200100287: According to this CR, ConEd made a commitment to the NRC for corrective actions following the August 31, 1999, event at IP2, but the Commitment Verification Project was unable to document that the commitment had been honored.**

2. **CR 200100288: Similar to CR 200100287, but for a different commitment.**
3. **CR 200100289: Similar to CR 200100287, but for a different commitment.**
4. **CR 200100290: Similar to CR 200100287, but for a different commitment.**
5. **CR 200100304: Similar to CR 200100287, but for a different commitment.**

6. **CR 200100292: According to this CR, an earlier CR (200003496) had been improperly closed out. These CRs involve safety analyses for transients such as loss of feedwater heating. The inference from this CR is that the safety analyses contain errors and omissions a la the Maine Yankee RELAP flap.**

7. **CR 200100295: According to this CR, an earlier CR (200005482) had been improperly closed out. These CRs involve vapor containment entries when containment integrity is required. This CR and CR 200100292 suggest that ConEd does not have an adequate problem identification and resolution process.**

8. **CR 200100306: According to this CR, the DC Systems Safety System Functional Assessment (SSFA) Team identified a number of CRs that had been improperly closed out. This CR reinforces the theme of CRs 200100292 and 200100295 that ConEd has an inadequate corrective action process.**

Washington Office: 1707 H Street NW Suite 600 • Washington DC 20006-3919 • 202-223-6133 • FAX: 202-223-6162

9. **CR 200100376: According to this CR, the current operation of the Chemical and Volume Control System conflicts with the system's design as described in the UFSAR because some installed equipment is no longer used. The Demand for Information sent to ConEd in October 1996 elicited a response claiming that ConEd had adequate assurance that IP2's operation was within its design bases. This CR indicates otherwise.**

10. **CR 200100719: According to this CR, a water hammer was observed on the east main steam header after bypassing the MS-1s on December 25, 2000. The cause of the water hammer is not specified, but usually results from failure to follow procedures or following bad procedures. The January 2, 2001, event was complicated by failure to follow procedures and bad procedures.**

11. **CR 200100327: According to this CR, numerous discrepancies between as-built wiring for the Reactor Protection System (RPS) and the system design have been discovered. According to the CR, "Resolution of discrepancies between as-found plant conditions and design drawings have often been resolved by revising drawing to match the as-found plant condition. These 'design changes by default' have been made without the required quality assurance requirements such as design verification or ensuring preservation of the licensing basis through a documents safety evaluation." This CR suggests a safety problem affecting RPS. This CR, however, suggests an even larger safety issue if discrepancies between the plant and its design bases are being resolved using a process that circumvents the legally established process. As a minimum, ConEd should sample drawing changes for several safety systems.**

12. **CR 200100335: According to this CR, 8 of 53 CRs reviewed had been determined to have been closed out on an Unacceptable basis. That percentage (15%) applied to the 5,482 CRs written (at least) during 2000 (from the CR referenced in CR 200100295) suggests that ConEd improperly closed over 800 CRs last year alone. Once again, ConEd's corrective action process looks badly flawed.**

13. **CR 200100336: According to this CR, "Operability Determination conclusions often have not supporting basis." Operability Determinations are prepared to justify continued operation of the reactor with degraded equipment or potentially degraded equipment. Thus, inadequate Operability Determinations provide a direct, immediate threat to safety that cannot be tolerated.**

14. **CR 200100338: According to this CR, a temporary procedure change was used on January 29, 1999, to allow a non-routine equipment lineup. That temporary procedure change, which has been revised several times to broaden the scope of the non-routine equipment lineup, remains in effect two years later. As the CR points out, the temporary procedure change process circumvents all the checks and balances that are provided for permanent plant procedure changes.**

**Dave Lochbaum**
**Nuclear Safety Engineer**