

From: Rick Ennis *NRR*
To: IP2 Lessons-Learned Task Group
Date: Mon, Aug 21, 2000 7:55 AM
Subject: Revised Task Group Notes

Attached are revised Task Group Notes for Jeff Harold, John Zwolinski, and Bob Weisman. The notes have been revised based on review and comments by the interviewees. I will file these final versions in Scott's notebook.

Also attached is an update to the status on the Task Group Note verifications (follow-up to my 8/8/00 email). If you have any change in status let me know.

The changes made to each of the attached Task Group Notes are as follows:

Jeff Harold

Item 7 - changed "possibly" to "possible."

John Z

Added item 9

Bob Weisman

Item 1 - changed "licensee's" to "licensees'."

Item 2e - Added "(" before Technical Specification.

Added Item 2g

Item 3 - changed "should" to "must."

J/123

Indian Point 2 (IP2) Steam Generator (SG) Tube Failure
Lessons-Learned Task Group
(TAC No. MA9163)

Task Group Notes - Discussion with Jeff Harold on 6/29/00

Task Group Attendees: Rick Ennis, Maitri Banerjee

Background

Jeff was the PM in DLPM for IP2 at the time of the event.

Focus of Discussion

The focus of this discussion was to look at the overall observations and lessons-learned related to the IP2 event.

Results

Jeff had the following observations:

- 1) The inspection interval extension amendment (Amendment No. 201) was no different from a licensing perspective than other (i.e., non-SG) inspection interval amendments.
- 2) Jeff doesn't see any problems with the current process for license amendment reviews as presently described in Office Letter 803. There are no process changes that would have had any bearing on this event.
- 3) Jeff doesn't think there would have been any benefit to Regional involvement in the Amendment No. 201 review.
- 4) He doesn't think any technical specification (TS) improvements are needed with respect to SG inspection. The better approach is to have the requirements outside the TSs with the requirements based on the latest industry guidelines.
- 5) Jeff thinks that Con Ed was committed to the previous revision of NEI 96-07 at the time of the event. He believes this commitment was based on a letter from NEI, not Con Ed. A possible suggestion is to have specific letters from utilities since it's not clear if a letter from NEI is enforceable as a licensee commitment.
- 6) Con Edison is not pro-active in general.
- 7) Con Edison is exploring the possible sale of IP2. This could impact what corrective actions they will take since they may be reluctant to make certain capital expenditures.

- 8) Duke is preparing the modification for the SG replacement.
- 9) EMCB doesn't have enough technical expertise (i.e., number of people) in the SG area.

10) The decision to put IP2 related documents on the web-site was due in part to complaints from the public on the difficulty using ADAMS. It was also thought this would limit the number of individual requests for copies of documentation. This way of responding to the public took (and is still taking) considerable resources. Putting this amount of resources on the public confidence pillar is taking resources away from the safety pillar.

Indian Point 2 (IP2) Steam Generator (SG) Tube Failure
Lessons-Learned Task Group
(TAC No. MA9163)

Task Group Notes - Discussion with John Zwolinski on 7/5/00

Attendees: Scott Newberry, Rick Ennis, Maitri Banerjee

Background

John is the Director of the Division of Licensing Project Management (DLPM) in NRR.

Focus of Discussion

The focus of this discussion was to determine if there are any lessons-learned as a result of the IP2 steam generator tube failure event.

Results

John had the following observations/comments:

- 1) DLPM is taking the lead on the Questions and Answers associated with the new source term amendment.
- 2) The nuclear plants in the Northeast have much more public interaction than plants in the rest of the country. John thought that setting up the IP2 web page was the right thing to do even given the added resources. He believes this is the right precedent to set for plants with high public interest. It's possible that providing the information on the web may have reduced the amount of controlled correspondence.
- 3) John believes the licensee should be more aggressive in communicating with the public (i.e., bulk of public interaction is by the NRC).
- 4) The scope and depth of the NRC staff review for the inspection interval extension amendment was appropriate. He noted that there was nothing unusual that should have prompted the staff to do a deeper review. Licensee performance for SG inspection industry-wide as a whole has been good as evidenced by only one tube failure recently out of thousands of tubes inspected.
- 5) With respect to the phone calls the staff holds to discuss the licensee's SG inspection results, John believes the current process is adequate based on industry operating experience.
- 6) John thinks it may be worthwhile to revisit the SG inspection requirements that are in the

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Technical Specifications (TSs). He's not sure the details should be relocated outside of the TSs.

- 7) John has concerns over the quality of Con Ed's management team. He thinks they should had a more questioning attitude with respect to the 1997 SG inspection results given the uncertainty due to poor quality data and given the age of the SGs.
- 8) John thinks it would be a good idea for members of the Task Group to visit the site.
- 9) John also stated that the large number of issues with respect to the licensee's root cause and operational assessment warrants SG replacement rather than continued further technical discussions. Unless our knowledge changes significantly, John is not going to be comfortable signing out the restart safety evaluation.

Indian Point 2 (IP2) Steam Generator (SG) Tube Failure
Lessons-Learned Task Group
(TAC No. MA9163)

Task Group Notes - Discussion with Bob Weisman on 7/17/00

Attendees: Rick Ennis, Jack Goldberg

Background

Bob was the OGC reviewer for the amendment approving the IP2 one-time extension of the SG inspection interval (IP2 Amendment No. 201, dated 6/9/99, TAC No. MA4526).

Focus of Discussion

The focus of this discussion was to look at OGC considerations in reviewing license amendments and if there are any specific lessons-learned related to the OGC review of IP2 Amendment No. 201.

Results

- 1) The Con Ed amendment request includes a page signed by a Con Ed Vice-President. This page also includes a notarized signature with the statement "Subscribed and sworn to before me this 7th day of December, 1998." Some licensees' applications include a statement that says something such as "to the best of my knowledge all information provided is true and correct." Does the Con Ed amendment request meet the requirements of 10 CFR 50.30(b) with respect to requirements for oath or affirmation?

The Con Ed amendment request with the notarized signature is sufficient to meet the oath or affirmation requirements. This notarized signature and the associated statement basically attests to the fact that the notary knows or has verified the identity of the person signing the application. Regardless of the oath or affirmation requirements, the licensee is required to provide information that is complete and accurate in all material respects in accordance with 10 CFR 50.9. In addition, the licensee shall not deliberately submit information that they know to be incomplete or inaccurate in some material respect in accordance with 10 CFR 50.5.

2) What criteria does OGC use to review a license amendment?

OGC typically assigns a lawyer to review an amendment based on the applicable Standard Review Plan (SRP) section (i.e., specific lawyers usually review specific technical areas). However, the information in the SRP is not used for the OGC review. The same review is done regardless if there is an applicable SRP section or not (there was no applicable SRP section for the review associated with IP2 Amendment No. 201). The OGC review normally includes the following steps:

- a) Verify the proper NRC staff signature authority for the letter transmitting the amendment and the amendment itself;
 - b) Review the initial Federal Register notice to ensure that licensee supplements to the original application don't affect the scope of the initial no significant hazards review;
 - c) Review the amendment package for completeness;
 - d) Review the Safety Evaluation (SE) for factual accuracy;
 - e) Review the SE to ensure accuracy of citations to references, (Technical Specification sections, regulations, etc.);
 - f) Ensure that environmental considerations are properly addressed in the SE; and
 - g) Review the SE to ensure that the staff has articulated a basis for its conclusions.
- 3) What is the NRC staff responsibility for addressing all information that forms the basis for the licensee's conclusions in a licensee's incoming license change request (e.g., if some of incoming information is incomplete or incorrect)?

There is no regulatory requirement for the staff to address all information that forms the basis for the licensee's conclusions in a licensee's incoming license change request. The staff may form the basis for granting the amendment based on any (or none) of the licensee's information. If the staff discovers that any of the incoming information is incomplete or incorrect, it would be a good idea to address this in the SE (even if this information was not relied on in the SE). The SE must be specific as to what information was relied on to form the basis for the staff's conclusions.

- 4) Are there any specific lessons-learned related to the OGC review of IP2 Amendment No. 201?

Bob thought the SE was well done and he couldn't think of any specific lessons-learned from this review.

Responsibilities for Verifying Task Group Notes Accuracy with Interviewees
Status as of August 21, 2000

Verification for Task Group Notes that are already filed:

<u>Date</u>	<u>Interviewee(s)</u>	<u>Responsibility</u>	<u>Changes required?</u>	<u>Notes Revised</u>
6/20/00	Joe Muscara	N/A (already done)	N/A	N/A
6/26/00	Tim Collins/Rich Barrett	Joe Donoghue		
6/27/00	Andrea Keim	Rick Ennis	No	N/A
6/29/00	Jeff Harold	Rick Ennis	Yes	Yes
6/29/00	Emmett Murphy	Rick Ennis		
7/5/00	Jack Strosnider	Scott Newberry		
7/5/00	John Zwolinski	Rick Ennis	Yes	Yes
7/17/00	Bob Weisman	Jack Goldberg	Yes	Yes
7/19/00	John Flack/John Ridgely	N/A (already done)	N/A	N/A
7/19/00	Stephanie Coffin	Joe Donoghue		
7/19/00	Gary Holahan	N/A (already done)	N/A	N/A
7/20/00	(Region I)*	Jimi Yerokun		
7/31/00	Ian Barnes	Rick Ennis	No	N/A
8/1/00	(Region I)**	Jimi Yerokun		
8/2/00	Ashok Thadani	Alan Rubin	No	N/A
8/9/00	Mike Mayfield	Alan Rubin	No	N/A

*Hub Miller/Pete Eselgroth/Randy Blough

** Wayne Lanning, Joe Carrasco, Jim Wiggins, Mike Modes,

Verification for Task Group Notes that have not yet been done or have not yet been finalized
(please verify writeup with interviewee before providing as final to Task Group):

<u>Date</u>	<u>Interviewee(s)</u>	<u>Responsibility</u>
8/10/00	Bill Dean	Tim Frye
8/11/00	Robert Perch	Rick Ennis