

March 13, 2000

The Honorable Sandra R. Galef  
New York State Assembly  
Room 540, Legislative Office Building  
Albany, New York 12248

Dear Ms. Galef:

I am responding to your letter of February 18, 2000 concerning the steam generator tube leak at the Indian Point 2 (IP2) nuclear plant on February 15, 2000. The Commission appreciates your concerns, and we are working to understand the event fully.

As you may know, the NRC formed an Augmented Inspection Team (AIT) at IP2 to determine what happened prior to, during, and following the steam generator tube failure event. As part of its review, the AIT will determine whether the licensee, Consolidated Edison (ConEd), met its commitments for inspecting, maintaining, and monitoring steam generator tubes. In addition, the AIT will review ConEd's implementation of emergency plan notification requirements. We will provide you a copy of the AIT report as soon as it is completed.

In addition to the AIT review, the Office of Nuclear Reactor Regulation (NRR) is conducting a review of the IP2 steam generators. This review will focus on the analysis of data arising from the steam generator inspections, problem identification, root cause analysis, and corrective actions. This effort will include the review of the results of the detailed examinations of the IP2 steam generators now being performed by ConEd. The NRC staff met publicly with ConEd on March 1, 2000, to discuss steam generator inspections, recovery plans, restart criteria, and the replacement steam generators.

The NRC requirements for the operation of steam generators include limitations on steam generator tube leakage during plant operation. The measured leak rates prior to the IP2 event were well below plant technical specification limits and within the more strict administrative limits established by the licensee. Commercial nuclear power industry experience has shown that steam generator leakage at the low levels noted at IP2 prior to the February 15, 2000 event is not predictive of a tube failure. However, as I already noted, when the root cause of the steam generator tube failure at IP2 is understood, the NRC staff will review ConEd's corrective actions to ensure that those actions minimize the potential for recurrence.

NRC requirements are intended to ensure the structural and leakage integrity of steam generator tubes. So long as these requirements are satisfied, the NRC does not require any other actions. The NRC does not have requirements for the timing of steam generator replacement. Licensees, in this case ConEd, decide whether or not to replace their steam generators based on the increasing costs of inspections, repairs, and lost operating time to continue to meet NRC requirements.

Operating experience throughout the fleet of nuclear plants in the United States has shown that significant steam generator tube leakage and tube failures have all involved only one steam generator tube at a time. As you observed, some concerns have been raised about the probability and consequences of multiple steam generator tube failures. Studies conducted by the NRC staff indicate that the potential for multiple steam generator tube ruptures is low. Additional studies have shown that even in the event of multiple steam generator tube ruptures, the likelihood of core melt is very low.

Notifications required for events such as the IP2 steam generator tube leak are prescribed in Federally-required emergency response plans established for each nuclear power plant. Coordinated but separate plans are established for government organizations involved in offsite response around each plant. Based on our review to date, it appears that ConEd made the notifications to offsite officials that are required immediately after the declaration of an Alert in accordance with its emergency response plan. These notifications are Federally-required because they notify offsite emergency response organizations about the need to implement their plans. However, ConEd may not have been timely in making several additional notifications that it committed to make to local municipal officials, but that are not included in its Federally-required emergency response plan. The NRC staff is still reviewing this matter to understand the concerns raised by the local officials.

Notifications of selective municipal officials of events at IP2 are prescribed in the local County Radiological Emergency Response Plans. Jurisdiction at the Federal level for the review and approval of such offsite emergency response plans rests with the Federal Emergency Management Agency (FEMA). ConEd officials have informed us that they intend to work with New York State, local counties and municipalities, and FEMA, as appropriate, to review lessons learned from this event. This will include an assessment of the notification process. We will provide support to this effort as needed.

I want to assure you that, based on the findings of the AIT and the review by NRR, the Commission will take appropriate actions to ensure that adequate safety margins exist. We plan a variety of activities to aid communities surrounding IP2 in understanding the event and our findings. For example, the AIT exit meeting with ConEd will be open to public observation, and the report will be posted on the NRC website ([www.nrc.gov](http://www.nrc.gov)). Also, we have scheduled a meeting to discuss the IP2 event, including NRC's preliminary conclusions, with members of the public. That meeting is planned for 7:00 p.m., March 14, 2000, at the New York State Armory in Peekskill, New York.

If you have any additional questions in this matter, please do not hesitate to contact me.

Sincerely,

**/RA/**

Richard A. Meserve

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