UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 27, 2000

Mr. Norm Cohen
Coordinator, UNPLUG Salem Campaign
Coalition for Peace and Justice
321 Barr Avenue
Linwood, NJ 08221

Dear Mr. Cohen:

During the recent telephone conference between you and the Office of Nuclear Reactor Regulation Petition Review Board on March 14, 2000, concerning your February 22, 2000, letter, Nuclear Regulatory Commission representatives indicated that the Agency would provide copies of the following documents to you:

- Public Service Electric and Gas Company's (PSE&G) letter, dated February 28, 2000, forwarding information on the Salem Unit 1 and Unit 2 steam generator tube inspections performed in 1999;
- Management Directive 8.11, "Review Process for 10 CFR 2.206 [Title 10 of the *Code of Federal Regulations*, Section 2.206] Petitions," revision dated July 1, 1999;
- Official transcript of the March 14, 2000, conference call.

The February 28, 2000, PSE&G letter is now available at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, and accessible electronically through the Agencywide Documents Access Management System (ADAMS) Public Electronic Reading Room link at the NRC Web site (http://www.nrc.gov) by referencing Accession Number ML003691698. If you have any questions, please call me at 301-415-1324.

Sincerely,

Robert Fretz, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-272 and 50-311

Enclosures: 1. PSE&G letter dated February 28, 2000
2. Management Directive 8.11
3. Transcript of March 14, 2000, phone call

cc w/encls: See next page

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/RA/

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Units 1 and 2

cc:

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Nuclear Business Unit

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Washington, DC 20555

TECHNICAL SPECIFICATION 6.9.1.5 ANNUAL REPORTS
SALEM AND HOPE CREEK GENERATING STATIONS
DOCKET NOS. 50-272, 50-311 AND 50-354

Gentlemen:

Public Service Electric and Gas Company (PSE&G) hereby submits the enclosed Annual Reports for the Salem and Hope Creek Generating Stations, in accordance with Technical Specifications 6.9.1.5.a and 6.9.1.5.b of Appendix A to Facility Operating License Nos. DPR-70, DPR-75 and NPF-57.

Pursuant to Technical Specification 6.9.1.5.a, Enclosures 1, 2 and 3 are submitted for Salem Unit 1, Salem Unit 2 and Hope Creek, respectively. These enclosures contain 1999 data on the number of station, utility and other personnel receiving exposures greater than 100 mrem/year and the collective exposures according to work and job function for each unit.

Enclosure 4 provides information pursuant to the requirements of Technical Specification 6.9.1.5.b of Appendix A to Facility Operating Licenses DPR-70 and DPR-75. This information pertains to the Salem Unit 1 and Unit 2 steam generator tube inspections completed in 1999.

Pursuant to the requirements of Technical Specification 6.9.1.5.b of Appendix A to Facility Operating License No. NPF-57, the following information is being provided concerning the Hope Creek Safety/Relief Valves (SRVs). During 1999, the SRVs were not challenged by any overpressurization events or transients that would have required the valves to respond. SRV testing was performed on installed SRVs during 1999 and the results, including a discussion on SRV setpoint drift, were provided to the NRC in Hope Creek LER 99-003-00, sent via letter LR-N990143, dated March 26, 1999.

Should you have any questions or comments regarding this submittal, please contact us.

Sincerely,

Gabor Salamon
Manager - Licensing

Enclosures (3)

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Manager - Financial Control & Co-Owner Affairs (N07)
Program Manager - Nuclear Review Board (N38)
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J. Ondish (X07)
V. Zabielski (N16)
R. Gary (N44)
NBU RM (N64)
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ENCLOSURE 1

Salem 1 - Year of 1999

NUMBER OF PERSONNEL AND MAN-REM BY WORK AND JOB FUNCTION

	All Personnel (> 100 mrem)			Total Man-Rem		
Work & Job Function	Station Employees	Utility Employees	Contractors and Others	Station Employees	Utility Employees	Contractor and Other
ROUTINE MAINTENANCE						
-MAINTENANCE	6	92	175	2.021	29.785	92.164
-OPERATIONS PERSONNEL	0	32	0	0.017	9.338	0.393
-HEALTH PHYSICS	2	44	37	0.500	19.644	17.568
-SUPERVISORY PERSONNEL	0	4	0	0.001	1.099	0.016
-ENGINEERING PERSONNEL	0	2	3	0.006	1.137	2.518
INSERVICE INSPECTION						
-MAINTENANCE	0	0	0	0.000	0.000	0.000
-OPERATIONS PERSONNEL	0	0	0	0.000	0.000	0.000
-HEALTH PHYSICS	0	0	0	0.000	0.000	0.000
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.000	0.000
-ENGINEERING PERSONNEL	0	0	0	0.000	0.000	0.000
SPECIAL MAINTENANCE						
-MAINTENANCE	0	2	24	0.044	1.152	8.082
-OPERATIONS PERSONNEL	0	6	0	0.000	1.171	0.022
-HEALTH PHYSICS	0	0	0	0.000	0.112	0.005
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.075	0.013
-ENGINEERING PERSONNEL	0	6	0	0.000	1.700	0.195
WASTE PROCESSING						
-MAINTENANCE	0	25	0	0.127	8.960	0.162
-OPERATIONS PERSONNEL	0	0	0	0.000	0.000	0.000
-HEALTH PHYSICS	0	0	1	0.000	0.000	0.254
-SUPERVISORY PERSONNEL	0	0	0	0.004	0.016	0.012
-ENGINEERING PERSONNEL	0	0	0	0.000	0.082	0.068
REFUELING						
-MAINTENANCE	0	0	0	0.003	0.297	0.072
-OPERATIONS PERSONNEL	0	0	4	0.000	0.096	3.915
-HEALTH PHYSICS	1	5	1	0.460	1.976	0.852
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.004	0.001
-ENGINEERING PERSONNEL	0	0	0	0.000	0.000	0.000
RX OPERATION & SURVEILL						
-MAINTENANCE	0	0	0	0.000	0.000	0.000
-OPERATIONS PERSONNEL	0	0	0	0.000	0.000	0.000
-HEALTH PHYSICS	0	0	0	0.000	0.000	0.000
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.000	0.000
-ENGINEERING PERSONNEL	0	0	0	0.000	0.000	0.000
TOTALS						
-MAINTENANCE	6	119	199	2.194	40.194	100.480
-OPERATIONS PERSONNEL	0	38	4	0.017	10.604	4.330
-HEALTH PHYSICS	3	49	39	0.960	21.732	18.679
-SUPERVISORY PERSONNEL	0	4	0	0.004	1.193	0.041
-ENGINEERING PERSONNEL	0	8	3	0.006	2.920	2.781
GRAND TOTALS	9	218	245	3.181	76.643	126.312
TOTAL DOSE						206.136

ENCLOSURE 2

ANNUAL REPORT

Salem 2 - Year of 1999

NUMBER OF PERSONNEL AND MAN-REM BY WORK AND JOB FUNCTION

Work & Job Function	All Personnel (> 100 mrem)			Total Man-Rem		
	Station Employees	Utility Employees	Contractors and Others	Station Employees	Utility Employees	Contractor and Othe
ROUTINE MAINTENANCE						
-MAINTENANCE	1	37	188	0.633	13.669	70.585
-OPERATIONS PERSONNEL	0	18	1	0.169	4.939	0.484
-HEALTH PHYSICS	0	24	33	0.180	6.305	8.613
-SUPERVISORY PERSONNEL	0	1	0	0.004	0.836	0.123
-ENGINEERING PERSONNEL	0	1	1	0.010	0.617	0.420
INSERVICE INSPECTION						
-MAINTENANCE	0	0	0	0.000	0.000	0.000
-OPERATIONS PERSONNEL	0	0	0	0.000	0.000	0.000
-HEALTH PHYSICS	0	0	0	0.000	0.000	0.000
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.000	0.000
-ENGINEERING PERSONNEL	0	0	0	0.000	0.000	0.000
SPECIAL MAINTENANCE						
-MAINTENANCE	0	2	15	0.076	0.560	4.639
-OPERATIONS PERSONNEL	0	2	0	0.000	0.446	0.008
-HEALTH PHYSICS	0	0	0	0.000	0.002	0.019
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.016	0.000
-ENGINEERING PERSONNEL	0	3	0	0.000	0.848	0.175
WASTE PROCESSING						
-MAINTENANCE	0	0	0	0.003	0.004	0.467
-OPERATIONS PERSONNEL	0	0	0	0.000	0.000	0.000
-HEALTH PHYSICS	0	0	0	0.000	0.000	0.000
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.000	0.003
-ENGINEERING PERSONNEL	0	0	0	0.000	0.001	0.019
REFUELING						
-MAINTENANCE	0	0	0	0.001	0.193	0.000
-OPERATIONS PERSONNEL	0	0	0	0.000	0.011	0.016
-HEALTH PHYSICS	1	0	2	0.135	0.439	0.702
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.000	0.000
-ENGINEERING PERSONNEL	0	0	0	0.000	0.000	0.000
RX OPERATION & SURVEILL						
-MAINTENANCE	0	0	0	0.000	0.000	0.000
-OPERATIONS PERSONNEL	0	0	0	0.000	0.000	0.000
-HEALTH PHYSICS	0	0	0	0.000	0.000	0.000
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.000	0.000
-ENGINEERING PERSONNEL	0	0	0	0.000	0.000	0.000
TOTALS						
-MAINTENANCE	1	39	203	0.713	14.425	75.691
-OPERATIONS PERSONNEL	0	20	1	0.170	5.396	0.507
-HEALTH PHYSICS	1	24	35	0.315	6.746	9.334
-SUPERVISORY PERSONNEL	0	1	0	0.004	0.852	0.126
-ENGINEERING PERSONNEL	0	4	1	0.010	1.466	0.614
GRAND TOTALS	2	88	240	1.212	28.885	86.271
TOTAL DOSE						116.368

ENCLOSURE 3

ANNUAL REPORT

Hope Creek - Year of 1999

NUMBER OF PERSONNEL AND MAN-REM BY WORK AND JOB FUNCTION

Work & Job Function	All Personnel (> 100 mrem)			Total Man-Rem		
	Station Employees	Utility Employees	Contractors and Others	Station Employees	Utility Employees	Contractor and Other
ROUTINE MAINTENANCE						
-MAINTENANCE	1	35	3	0.416	12.692	0.997
-OPERATIONS PERSONNEL	0	20	0	0.000	4.911	0.019
-HEALTH PHYSICS	0	22	0	0.000	6.825	0.326
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.003	0.007
-ENGINEERING PERSONNEL	0	0	0	0.001	0.334	0.026
INSERVICE INSPECTION						
-MAINTENANCE	0	36	8	0.325	11.726	2.791
-OPERATIONS PERSONNEL	0	11	0	0.004	3.784	0.373
-HEALTH PHYSICS	1	17	1	0.143	4.708	0.430
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.022	0.012
-ENGINEERING PERSONNEL	0	0	0	0.007	0.273	0.018
SPECIAL MAINTENANCE						
-MAINTENANCE	0	0	0	0.000	0.081	0.023
-OPERATIONS PERSONNEL	0	0	0	0.000	0.046	0.000
-HEALTH PHYSICS	0	0	0	0.000	0.000	0.000
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.000	0.000
-ENGINEERING PERSONNEL	0	0	0	0.000	0.050	0.001
WASTE PROCESSING						
-MAINTENANCE	0	0	0	0.000	0.012	0.000
-OPERATIONS PERSONNEL	0	0	0	0.000	0.000	0.000
-HEALTH PHYSICS	0	0	0	0.000	0.017	0.018
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.000	0.000
-ENGINEERING PERSONNEL	0	0	0	0.000	0.000	0.000
REFUELING						
-MAINTENANCE	0	0	0	0.001	0.201	0.038
-OPERATIONS PERSONNEL	0	0	0	0.000	0.000	0.006
-HEALTH PHYSICS	0	6	2	0.006	2.217	0.509
-SUPERVISORY PERSONNEL	0	0	0	0.000	0.033	0.002
-ENGINEERING PERSONNEL	0	0	0	0.000	0.000	0.007
RX OPERATION & SURVEILL						
-MAINTENANCE	4	120	276	1.389	39.800	126.192
-OPERATIONS PERSONNEL	0	48	5	0.002	11.935	4.512
-HEALTH PHYSICS	1	32	79	0.504	11.895	26.941
-SUPERVISORY PERSONNEL	0	1	0	0.015	1.418	0.068
-ENGINEERING PERSONNEL	0	8	6	0.014	3.281	1.012
TOTALS						
-MAINTENANCE	5	191	287	2.132	64.512	130.040
-OPERATIONS PERSONNEL	0	79	5	0.006	20.676	4.910
-HEALTH PHYSICS	2	77	82	0.652	25.663	28.224
-SUPERVISORY PERSONNEL	0	1	0	0.016	1.477	0.089
-ENGINEERING PERSONNEL	0	8	6	0.022	3.938	1.064
GRAND TOTALS	7	356	380	2.829	116.266	164.326
TOTAL DOSE						283.421

ENCLOSURE 4

Salem Unit 1 and Unit 2 1999 Steam Generator Tube ISI Report

During 1999 Framatome Technologies Incorporated (FTI) conducted Eddy Current examinations on the Unit 1 and Unit 2 steam generators during 1R13 and 2R10 respectively. The dates for each outage are shown below:

- Unit 1 9/18/99 to 10/26/99
- Unit 2 4/3/99 to 5/28/99

All inspections were performed under the supervision of PSE&G's Steam Generator/Reactor Vessel Group. Zetec Incorporated performed secondary production/resolution data analysis for both outages.

Examination Scope

The scopes of the inspection were delineated in the 1R13 and 2R10 Steam Generator Tubing Degradation Assessments. These documents identified the degradation mechanisms that have or could affect the tubing in the applicable units steam generators, identified the inspection scope and techniques to be used, documented the review of EPRI qualified techniques against site-specific steam generator conditions and provided structural limits for those damage mechanism most likely to be found during the outages which were used to assess tube integrity requirements. Attachment 5 of this report provides the NDE Techniques utilized during 1R13 and 2R10 for detection (and sizing as applicable) of each degradation mechanism.

To ensure the resolution process was properly performed and that field calls were properly reported PSE&G utilized independent QDA Level III's during both outages per the requirements of EPRI PWR Steam Generator Examination Guidelines, Rev. 5.

Rev 5 of the EPRI PWR Steam Generator Examination Guidelines allows utilities to deviate from specific requirements through a documented technical justification for each deviation. Six technical deviations were implemented for 1R13 and nine for 2R10. All deviations were reviewed and approved by PSE&G NBU Senior management.

A summary of the eddy current scope and results for 1R13 and 2R10 follows:

Abbreviations

#H or #C	Tubes Support Plate elevation Hot Leg or Cold Leg side of Steam Generator
1R13	Unit 1 Refueling Outage 13
2R10	Unit 2 Refueling Outage 10
AV#	Anti-Vibration Bar Number designator (e.g. AV1 is Anti-Vibration Bar 1)
AVB	Anti-Vibration Bar
CDS	Computer Data Screening
CL	Cold Leg
DNI	Dent with possible indication
DSI	Distorted Support Indication
EPRI	Electric Power Research Institute
ETL	Expansion Transition Location
FDB	Flow Distribution Baffle
FSD	Free Span Differential
FTI	Framatome Technologies Incorporated
HL	Hot Leg
I-690	Inconel 690
IGA	Inter Granular Attack
ISI	In-Service Inspection
MBI	Manufacturer's Burnish Indication
MBM	Manufacturer's Burnish Mark
NBU	Nuclear Business Unit
NDE	Non Destructive Examination
NEI	Nuclear Energy Institute
NTE	No Tube Expansion
ODSCC	Outside Diameter Stress Corrosion Cracking
PLG	Plug
PSE&G	Public Service Electric & Gas
PSI	Possible Support Indication
PTE	Partial Tube Expansion
PWSCC	Primary Water Stress Corrosion Cracking
QDA	Qualified Data Analyst
R1	Row 1
R2	Row 2
RFO	Refueling Outage
RPC	Rotating Pancake Coil
SG	Steam Generator
SOD	Shallow Outside Diameter Indication
TSH	Tubesheet Hot Leg Side
TSP	Tube Support Plate
TTS	Top of Tubesheet

UNIT 1

Eddy current data acquisition was performed utilizing four SM-22 Manipulators with a dual guide tube tool head. Inspection data was transmitted to FTI's Lynchburg VA and Benicia CA data room facilities for primary production analysis and to Zetec's Issaquah WA data room facility for secondary production analysis. Resolution analysis was performed at the Salem off-site data room facility. Primary tubing degradation analysis was performed manually by FTI. FTI utilized Computerized Data Screening (CDS) for dent, ding, and sludge analysis. Zetec utilized CDS for secondary bobbin coil tubing degradation analysis. Secondary analysis for RPC data was performed manually. The table below lists the inspection scope performed during 1R13.

1R13 SG Inspection Scope

	Area	Probe	Inspections Performed	# Of Exams
1	Full Length (tube end to tube end)	Bobbin	Inspected 100% of the in-service tubes in each steam generator	22,491
2	Short Radius U-Bends (07H to 07C)	+Point™	Inspected 20% of the in-service Row 1 and Row 2 tubes in 11 and 13 steam generator.	100
3	HL TTS area @ an extent of +2", -3" in each SG	+Point™	Inspected 20% of the in-service tubes in 11 and 13 SG at the HL TTS Transition	2,276
4	Dented TSP Intersections (> 5 volts) and Free Span Bobbin Indications (Dings, >5 volts)	+Point™	Inspected 20% of >5 volt dented TSP's and 20% of >5 volts freespan dings up to 07H +2" in each steam generator	59
5	Tubesheet anomalies	+Point™	Inspected all history ETLs and PTEs in the area of interest	10
6	Distorted Support Signals (DSI)	+Point™	Inspected 100% of all bobbin signals	9
7	Free Span Bobbin Indications (MBM's & FSD's)	+Point™	MBM's or FSDs with bobbin voltage greater than 2 volts that exhibit growth or change from the baseline data, were inspected using Plus Point™ probes. Change is defined as a >0.5 voltage gain, and >15 degree phase shift towards the defect plane.	54

UNIT 2

Eddy current data acquisition was performed with the ROGER Manipulator using a dual guide tube tool head. Inspection data was transmitted to FTI's Lynchburg, VA, and Benicia, CA, data room facilities for primary production analysis and to Zetec's Issaquah, WA, data room facility for secondary production analysis. Resolution analysis was performed at the Salem off-site data room facility. All tubing degradation analyses were performed manually. Computerized data screening (CDS) was utilized for dents, dings, and possible support ligament indications.

2R10 SG Inspection Scope

	Area	Probe	Inspections Performed	# Of Exams
1	Full Length (tube end to tube end)	Bobbin	Inspected 100% of the in-service tubes in each steam generator	12,846
2	Short Radius U-Bends (07H to 07C)	+Point™	Inspected 20% of the in-service Row 2 tubes in 21, 22 and 24 steam generators. Inspected 100% of the in-service Row 2 tubes and 20% of the Row 3 tubes and in 23 steam generator.	170
3	HL TTS area @ an extent the following extents: • +2", -3" in 21-23 SG's • +2, –5.5" in 24 SG	+Point™	Inspected 100% of the In-service tubes in each steam generator at the appropriate extent.	12,846
4	Tubesheet anomalies (Full length)	+Point™	Inspected 100% of the previous NTE's (SG24, R13C12.	1
4a	Tubesheet anomalies (area of interest)	+Point™	Inspected all Historical ETL's and PTE's.	55
5	Distorted Tubesheet Signals	+Point™	Inspected 100% of all bobbin signals.	1
6	Distorted Dented TSP Intersections (DNI)	+Point™	Inspected 100% of all bobbin signals.	14
6a	>2 Volt Dented TSP Intersections	+Point™	Inspected 100% in each SG at 01H to 04H, Inspected 20% @ 05H in SG 24.	5795
6b	>5 Volt Dented TSP Intersections	+Point™	Inspected 20% in SG24 @ 06H and 07H.	129
7	Distorted Support Signals (DSI)	+Point™	Inspected 100% of all bobbin signals.	15
8	Suspect TSP Ligament Cracks (PSI)	Bobbin & +Point™	Inspected with +Point™ 100% of all bobbin PSI calls.	20
9	Free Span Bobbin Indications (MBI's and FSI's)	+Point™	Inspected 100% of all bobbin signals.	50
10	Free Span Bobbin Indications (Dings)	+Point™	Inspected 100% of the HL >2 volt dings in each steam generator.	325

Examination Results

Unit 1

Consistent with the requirements specified in NEI 97-06, Steam Generator Program Guidelines, the Unit 1 steam generators met the structural integrity, accident induced leakage and operational leakage performance criteria specified site procedure SC.SA-AP.ZZ-0042(Q), Steam Generator Program for 1R13. The following table summarizes the number of tubes removed from service in each steam generator during 1R13 based on the applicable mode of degradation. In addition, cumulative tube plugging percentage for Salem Unit 1 is provided.

MODES OF DEGRADATION	SG 11	SG 12	SG 13	SG 14	TOTAL
AVB WEAR	3	0	2	3	8
NTE	0	0	2	0	2
TOTAL TUBES PLUGGED CUMULATIVE	3	3	13	4	23
CUMULATIVE TUBE PLUGGING %					0.10

FTI Inconel 690 mechanical rolled tube plugs were utilized for steam generator tube plugging as a result of eddy current inspections.

Anti-Vibration Bar (AVB) Wear

Wear was identified in the U-bend region of all steam generators. This mechanism has been attributed to vibration of the tube against the anti-vibration bars. This damage mechanism has been the most significant cause of tube plugging to date in Model F type steam generators. AVB wear is easily detected with bobbin coil probes and the bobbin coil sizing uncertainty is relatively low. Eight tubes were removed from service due to AVB wear. The table below shows total population of AVB wear called during 1R13.

	11 SG	12 SG	13 SG	14 SG
AVB Wear Indications	65	60	107	66
Total Tubes with AVB Wear	36	37	64	34

Based on the growth rates observed during the cycle, tubes with AVB wear indications of 35% throughwall and greater were removed from service during. The growth rates seen during 1R13 were within the expected parameters for the 1st cycle of operation of Model F steam generators and are expected to decrease during subsequent ISI's.

Manufacturer's Burnish Marks (MBM) / Free Span Differential Signal (FSD)

Both MBM and FSD signals are the result of a light buffing of the tubes to remove small imperfections of the tubing outside diameter. The two are analogous with the exception that the FSD's are readily discernable in the differential channels whereas MBM's are called in the absolute channel. During the Unit 1 baseline inspection 37,855 MBM indications were identified. The criterion for reporting MBM's was very conservative for the baseline inspection. The only requirement for reporting MBM's was the indication be present in channel 6 (150 kHz absolute). Emphasis was placed on making sure all MBM's were identified so they can be tracked during future exams.

During 1R13 the reporting criteria for MBM's was the indication had to be greater than 0.5" in length, > 2 volts, and less than 90 degrees in 150 kHz absolute channel. Resolution analysts were required to perform historical reviews of MBM's and FSD to determine if the signals had "changed" by more than 15 degrees or more than .5 volts since the baseline. Confirmation of "change", as described above, resulted in supplemental RPC testing. None of the MBM or FSD indications were confirmed as crack-like based on RPC test results.

No Tube Expansion (NTE)

No tube expansion refers to the condition where there is no hydraulic expansion for the full depth of the tubesheet, thus a crevice condition exists. Two tubes in #13 steam generator were identified as having NTE's during 1R13, R54C60 Tubesheet Hot and R46C64 Tubesheet Cold. Westinghouse provided an evaluation that demonstrated the design requirements were met for all analyzed conditions. Both tubes were preventatively plugged during the outage.

Loose Parts

The bobbin coil data was manually analyzed for loose parts two tubes around the entire periphery and down the divider plate. One tube in 14-steam generator, Row 14 Column 4, was identified as having a possible loose part indication. The loose part was visually confirmed during the post sludge-lancing top of tubesheet inspections. The part appears to be a carbon steel turning in an irregular curled shape. The part was grabbed and manipulated from two different directions multiple times but could not be removed. Supplemental RPC inspection of this and surrounding tubes found no evidence of tube wear or degradation. These tubes were evaluated and determined acceptable for continued service. The evaluation also documented acceptance for leaving this part in the steam generator for the next operating cycle.

Technical Specification Classification

The categorization of each steam generator is listed in the table below and takes into consideration both the bobbin coil and RPC inspection results.

	11 SG	12 SG	13 SG	14 SG
Technical Specification Category	C-2	C-1	C-1	C-1

Unit 2

Consistent with the requirements specified in NEI 97-06, Steam Generator Program Guidelines, the Unit 2 steam generators met the structural integrity, accident induced leakage and operational leakage performance criteria specified site procedure SC.SA-AP.ZZ-0042(Q), Steam Generator Program for 2R10. The following table summarizes the number of tubes removed from service in each steam generator during 2R10 based on the applicable mode of degradation. In addition, cumulative tube plugging percentage for Salem Unit 2 is provided.

Modes of Degradation	SG 21	SG 22	SG23	SG24	TOTAL
PWSCC @ HL TTS (Circ)	0	1	2	1	4
PWSCC @ HL TTS (Axial)	6	11	2	20	39
AVB WEAR	1	0	1	0	2
PWSCC @ HL TSP (Axial)	1	0	0	0	1
PWSCC LOW ROW U-BENDS (Circ)	0	0	4	0	4
HL FREESPAN ODSCC	1	0	0	0	1
TOTAL INDICATIONS					51
TOTAL TUBES PLUGGED	9	10	8	20	47
TOTAL TUBES PLUGGED CUMULATIVE	166	183	144	260	753
CUMULATIVE TUBE PLUGGING %					5.6

FTI designed Inconnel 690 mechanical rolled tube plugs were utilized for steam generator tube plugging as a result of eddy current inspections.

Primary Water Stress Corrosion Cracking (PWSCC) in Hot Leg Tubesheet (TTS) and Tube Support (TSP) Regions

Axial and circumferential PWSCC was identified in the hot leg tubesheets during 2R10. All of the tubes with indications were subject to an historical review for detection, sizing, and growth rates for condition monitoring. No tubes required stabilization during 2R10.

Steam generator 21, tube R15 C13 had the only axial PWSCC indication at a tube support elevation. This indication was located at 02H in a 2.41-volt dent. The bobbin coil examination did not identify this tube support as distorted.

Anti-Vibration Bar Wear

Wear was previously identified in the U-bend region of all four-steam generators. This mechanism has been attributed to vibration of the tube against the anti-vibration bars. One tube in steam generator 21 and one tube in steam generator 23 were plugged for AVB wear during 2R10.

Low Row U-bend Indications

During the 20% +Point examination of the Row 2 U-bends in steam generator 23, an inside diameter single circumferential indication (SCI) was identified in the hot leg tangent of tube R2 C9, requiring an expansion to 100% of the Row 2 U-bends, and a 20% sample of the Row 3 U-bends in S/G 23. During the expansion three more Row 2 tubes were identified as having similar SCI indications. Based on historical reviews, these indications are not believed to be active and may be due to geometry, but were conservatively removed from service.

Manufacturer's Burnish Marks

MBM's were identified with the bobbin coil examination. All freespan indications indicative of an MBM type signal were compared to the 1983 data for historical comparison and to identify change in the signals between the two examinations. Any changes based on the parameters of the freespan flow chart were further examined with RPC probe. None of indications were confirmed as crack-like when examined with the RPC probe. No tubes were plugged due to MBM's.

Freespan Differential Signals

R18C9 in S/G 21 had eleven (11) bobbin indications that were not evident in the 1996 data. The +Point probe identified 18 axial indications along the same axial plane between the hot leg tubesheet and the first support. The mid frequency identifies what appeared to be two axial scratches that run between this span, and these indications occur along the length of one of these scratches. This tube was removed from service.

All of the tubes from the same heat lot as tube R18C9 were re-evaluated by the lead analyst in steam generator 21 from TSH to 01H on the bobbin coil data looking for similar indications, and none were noted.

Previous Shallow Outside Diameter (SOD) Indications

Results of the +Point examination from 2R9 categorized several tube supports with "shallow outside diameter" indications that were inspected with +Point probe during 2R10. These indications either disappeared from the data due to chemical cleaning, or exhibited no change in signal characteristics from 2R9 to 2R10. All SOD indications require no further action during subsequent refueling outages.

Technical Specification Classification

The categorization of each steam generator is listed in the table below and takes into consideration both the bobbin coil and RPC inspection results.

	21 SG	22 SG	23 SG	24 SG
Technical Specification Category	C-2	C-2	C-2	C-2

Tube Mis-encode

During 2R10, it became apparent that some tubes in steam generators 21 and 22 were incorrectly identified during the 2R9 (1996) examination. This resulted in an extensive comparison of 2R10 data to the 2R9 data for all four steam generators. This review found the condition limited to 21 and 22 steam generators. As a result of this comparison, a total of 79 tubes were found to have not been inspected during the 2R9 outage. This information was previously communicated to the USNRC during a 5/3/99 telephone conference.

Per Letter LN-N97105 Dated February 28, 1997 PSE&G submitted the Technical Specification 6.9.1.5 Annual Reports for the Salem Unit 1 and Unit 2 steam generator inspections completed during 1996. This report stated that a 100% bobbin coil inspection was performed in 21 through 24 steam generators. This report makes a correction to the referenced submittal for 21 and 22 steam generators. Since a total of 79 tubes in 21 and 22 steam generators were identified as not being inspected during 2R9, the 100% bobbin coil inspection, as previously reported, was not performed. PSE&G determined there were no changes to the overall inspection results classification (C1, C2 or C-3) for 21 and 22 steam generators. In addition, PSE&G determined there were no Technical Specification Violations due to 79 tubes not being inspected during 2R9.

Attachments

The following data management summary reports are grouped as attachments, which provide the in-service inspection results per Technical Specification 4.4.5.5.b (Unit 1) and 4.4.6.5.b (Unit 2):

- Attachment 1 – Unit 1, 1R13 - Location and % through-wall indications.
- Attachment 2 – Unit 1, 1R13 - Identification of tubes plugged.
- Attachment 3 – Unit 2, 2R10 – Location and % through-all indications.
- Attachment 4 – Unit 2, 2R10 – Identification of tubes plugged.
- Attachment 5 – 1R13 and 2R10 NDE Techniques

Attachment 1

1R13 Location and Percent Through Wall Indications

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
26	91	10	AV6	+0.00
31	10	14	AV5	+0.00
		11	AV2	+0.06
38	78	17	AV5	+0.12
38	107	20	AV3	+0.00
		13	AV5	+0.08
39	59	17	AV2	-0.50
39	66	15	AV3	+0.00
		14	AV4	+0.00
		12	AV6	+0.00
40	17	23	AV5	-0.09
40	18	19	AV5	+0.04
		13	AV3	+0.00
		13	AV4	+0.10
40	43	19	AV2	+0.00
		15	AV3	+0.00
		14	AV6	+0.00
40	47	11	AV3	-0.12
40	54	30	AV3	+0.00
40	60	15	AV2	+0.00
		24	AV3	+0.00
		17	AV4	+0.00
		20	AV5	+0.00
40	62	14	AV1	-0.04
		13	AV2	+0.05
		17	AV5	+0.00
40	104	10	AV5	-0.02
41	19	11	AV6	+0.00
41	52	31	AV3	+0.00
41	61	18	AV5	-0.04
		16	AV4	+0.00
		19	AV3	+0.18
		16	AV2	+0.00
41	103	14	AV5	-0.02
42	19	15	AV6	+0.00

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
42	20	12	AV5	+0.00
		12	AV4	-0.04
42	59	29	AV4	+0.96
43	23	12	AV4	+0.00
43	38	11	AV3	-0.02
43	41	10	AV4	-0.06
		13	AV3	+0.00
		10	AV2	+0.00
43	64	19	AV3	+0.00
44	21	27	AV2	+0.09
44	22	17	AV5	-0.02
44	77	12	AV3	+0.02
44	78	21	AV5	+0.00
		24	AV4	+0.00
		12	AV2	+0.00
		14	AV1	+0.00
47	25	47	AV4	+0.08
47	99	12	AV3	+0.06
48	98	27	AV3	+0.04
		35	AV4	+0.02
		17	AV5	+0.00
		25	AV6	+0.08
50	82	18	AV2	+0.45
50	95	25	AV6	+0.00
		24	AV5	+0.02
		54	AV4	-0.10
		26	AV2	+0.04
		16	AV1	-0.02
53	33	17	AV5	-0.08
53	35	12	AV5	+0.00

Total Tubes : 36
Total Records: 65

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
29	112	14	AV5	+0.00
36	107	13	AV4	+0.00
36	108	21	AV1	+0.00
38	105	18	AV3	+0.00
38	106	11	AV4	+0.00
		15	AV5	+0.00
38	107	13	AV2	+0.00
39	67	13	AV4	-0.27
		24	AV3	+0.55
		16	AV1	-0.02
39	70	31	AV3	+0.14
39	103	16	AV5	+0.00
		10	AV4	+0.02
		10	AV2	+0.00
39	104	11	AV4	+0.06
		10	AV2	+0.04
39	105	26	AV5	+0.00
		11	AV4	+0.04
		14	AV2	+0.00
39	106	18	AV4	+0.00
		13	AV3	+0.00
40	47	20	AV2	+0.17
		14	AV5	+0.02
40	80	15	AV4	+0.00
		27	AV2	+0.00
		32	AV3	+0.00
40	82	17	AV3	+0.00
40	83	19	AV5	+0.00
40	88	23	AV3	+0.00
		18	AV2	-0.04
40	91	16	AV6	+0.13
		13	AV5	-0.04
		14	AV4	+0.13
		14	AV2	+0.06
40	102	27	AV3	+0.08

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
40	103	13	AV4	+0.00
		15	AV2	+0.00
40	106	13	AV5	+0.00
		10	AV4	+0.00
		11	AV3	+0.00
41	86	26	AV4	+0.00
41	87	18	AV4	-0.13
41	90	10	AV2	-0.02
41	92	17	AV5	+0.25
		14	AV4	+0.02
41	103	20	AV4	+0.00
42	47	11	AV3	+0.00
42	55	17	AV5	-0.06
42	62	22	AV4	-0.09
42	99	29	AV3	+0.00
42	103	17	AV5	+0.00
		26	AV4	+0.00
47	97	22	AV4	+0.08
47	99	23	AV5	+0.00
		16	AV2	+0.00
48	25	24	AV6	+0.00
		17	AV5	-0.06
50	28	27	AV5	+0.00
56	77	14	AV4	-0.04
57	44	12	AV4	+0.02

Total Tubes : 37
Total Records: 60

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
26	43	13	AV1	+0.00
27	115	18	AV2	+0.00
30	114	16	AV2	+0.00
		15	AV5	+0.00
36	80	18	AV3	+0.00
36	97	18	AV3	+0.25
36	109	14	AV2	+0.11
38	58	13	AV5	+0.00
38	60	18	AV3	-0.12
		22	AV2	+0.24
38	66	13	AV4	+0.00
38	72	14	AV3	+0.00
		14	AV2	+0.00
		12	AV4	+0.00
38	83	17	AV3	-0.09
38	93	18	AV5	+0.04
38	94	15	AV3	+0.06
		12	AV2	+0.14
38	98	24	AV3	+0.00
38	106	18	AV6	+0.19
		13	AV2	+0.13
39	47	12	AV5	+0.00
39	51	15	AV6	+0.00
39	54	17	AV3	-0.02
39	56	15	AV3	+0.00
		16	AV4	+0.02
39	58	17	AV3	+0.00
39	65	10	AV2	-0.11
		12	AV1	+0.13
39	76	20	AV2	+0.00
		25	AV6	+0.00
40	19	19	AV3	+0.00
40	62	14	AV5	+0.02
40	82	14	AV2	+0.06
		11	AV3	+0.14

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
		12	AV4	-0.04
41	103	16	AV6	+0.00
		19	AV4	+0.04
42	41	11	AV4	+0.00
42	42	11	AV2	+0.00
		12	AV4	+0.00
42	44	19	AV3	+0.06
		11	AV4	+0.06
		12	AV6	+0.00
43	41	11	AV5	+0.02
43	58	17	AV5	+0.00
		11	AV4	+0.00
		32	AV3	+0.04
		13	AV2	+0.00
43	66	26	AV4	+0.00
		10	AV2	+0.00
43	68	19	AV2	-0.10
43	72	16	AV6	+0.00
43	84	21	AV3	+0.09
		11	AV2	-0.18
43	99	23	AV4	+0.00
43	100	10	AV6	-0.02
		13	AV4	-0.09
		17	AV3	+0.02
		11	AV2	+0.00
44	61	12	AV4	+0.00
		26	AV3	-0.06
44	62	25	AV5	+0.00
		36	AV4	+0.00
44	65	24	AV3	+0.14
46	24	20	AV5	-0.11
46	46	12	AV4	+0.00
46	61	17	AV5	-0.13
		26	AV4	-0.49
46	72	35	AV3	+0.00

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
		24	AV2	+0.00
46	75	18	AV2	+0.00
47	24	22	AV5	-0.02
47	25	17	AV5	+0.00
47	83	13	AV2	-0.02
47	99	22	AV6	-0.04
49	96	19	AV5	+0.00
50	28	27	AV4	+0.00
		22	AV5	-0.20
50	79	16	AV3	+0.00
		16	AV2	+0.00
50	83	12	AV6	-0.11
		13	AV4	-0.07
		19	AV3	-0.15
50	92	13	AV6	-0.06
		13	AV5	-0.06
		13	AV4	-0.02
50	95	27	AV5	+0.00
		25	AV3	+0.02
		11	AV1	+0.00
52	33	21	AV6	+0.02
52	34	19	AV6	+0.00
52	74	21	AV4	+0.00
53	33	21	AV6	+0.00
		20	AV5	+0.00
53	90	32	AV4	+0.08
		18	AV3	+0.06
54	70	16	AV2	+0.00
		13	AV3	+0.00
		21	AV4	+0.00
54	74	27	AV4	-0.06
		10	AV3	-0.02
56	82	22	AV6	+0.00
		25	AV5	+0.00
		16	AV4	+0.00

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
58	47	13	AV4	+0.00
		18	AV5	+0.00

Total Tubes : 64
Total Records: 107

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
24	116	15	AV1	+0.00
25	8	11	AV1	-0.18
26	8	12	AV1	-0.35
		12	AV6	-0.36
26	115	11	AV1	+0.02
28	8	26	AV1	+0.00
28	12	12	AV6	+0.00
30	9	21	AV2	+0.00
30	10	10	AV2	+0.11
31	10	16	AV2	+0.00
32	84	10	AV2	+0.12
32	109	14	AV2	-0.02
37	83	21	AV5	+0.00
38	101	14	AV3	-0.04
40	18	24	AV4	+0.00
		30	AV5	+0.00
40	48	15	AV5	+0.00
		11	AV1	-0.10
40	51	11	AV4	+0.00
		19	AV3	+0.00
40	52	20	AV5	+0.00
		10	AV6	+0.00
40	76	24	AV4	+0.22
		19	AV3	+0.13
40	81	12	AV1	+0.00
40	85	10	AV4	+0.26
		10	AV2	+0.00
43	55	15	AV2	+0.08
		15	AV3	+0.33
		12	AV5	-0.02
		17	AV6	+0.12
46	24	12	AV6	+0.00
47	24	27	AV5	-0.02
		14	AV4	+0.17
		37	AV3	-0.04

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
		21	AV6	-0.02
47	25	18	AV5	-0.02
		16	AV4	+0.17
		30	AV3	+0.19
		24	AV2	+0.02
47	43	13	AV3	+0.06
47	48	16	AV5	+0.00
		16	AV3	-0.08
47	60	12	AV2	+0.00
		18	AV4	+0.00
		30	AV5	+0.00
47	72	18	AV4	+0.00
		20	AV3	+0.00
47	81	21	AV4	+0.25
		23	AV3	+0.21
		19	AV2	+0.04
		13	AV1	+0.06
47	83	22	AV3	+0.00
		17	AV5	+0.00
47	99	17	AV1	+0.02
		20	AV2	+0.00
		38	AV3	+0.06
		27	AV4	-0.02
		23	AV6	+0.04
48	25	23	AV6	-0.04
		35	AV5	+0.00
		22	AV4	+0.00
		17	AV3	-0.02
		30	AV2	+0.04
55	83	12	AV6	-0.04
56	41	13	AV5	+0.08

Total Tubes : 34
Total Records: 66

Attachment 2

Identification of Tubes Plugged During
1R13

QUERY: QueryM1

ROW	COL	LEG	OUTAGE	CODE
47	25	COLD	09/99 RFO 1R13	PLG
		HOT	09/99 RFO 1R13	PLG
48	98	COLD	09/99 RFO 1R13	PLG
		HOT	09/99 RFO 1R13	PLG
50	95	COLD	09/99 RFO 1R13	PLG
		HOT	09/99 RFO 1R13	PLG

Total Tubes : 3
Total Records: 6

QUERY: QueryM1

ROW	COL	LEG	OUTAGE	CODE

Total Tubes : 0
Total Records: 0

QUERY: QueryM1

ROW	COL	LEG	OUTAGE	CODE
44	62	COLD	09/99 RFO 1R13	PLG
		HOT	09/99 RFO 1R13	PLG
46	64	COLD	09/99 RFO 1R13	PLG
		HOT	09/99 RFO 1R13	PLG
46	72	COLD	09/99 RFO 1R13	PLG
		HOT	09/99 RFO 1R13	PLG
54	60	COLD	09/99 RFO 1R13	PLG
		HOT	09/99 RFO 1R13	PLG

Total Tubes : 4
Total Records: 8

QUERY: QueryM1

ROW	COL	LEG	OUTAGE	CODE
47	24	COLD	09/99 RFO 1R13	PLG
		HOT	09/99 RFO 1R13	PLG
47	99	COLD	09/99 RFO 1R13	PLG
		HOT	09/99 RFO 1R13	PLG
48	25	COLD	09/99 RFO 1R13	PLG
		HOT	09/99 RFO 1R13	PLG

Total Tubes : 3
Total Records: 6

QUERY: QueryM1

ROW	COL	LEG	OUTAGE	CODE	REPAIR TYPE	MATERIAL	MANUF	INSTALLED	REMOVED
47	24	COLD	09/99 RFO 1R13	PLG	ROLLED	I690	FTI	10-11-1999	
		HOT	09/99 RFO 1R13	PLG	ROLLED	I690	FTI	10-11-1999	
47	99	COLD	09/99 RFO 1R13	PLG	ROLLED	I690	FTI	10-11-1999	
		HOT	09/99 RFO 1R13	PLG	ROLLED	I690	FTI	10-11-1999	
48	25	COLD	09/99 RFO 1R13	PLG	ROLLED	I690	FTI	10-11-1999	
		HOT	09/99 RFO 1R13	PLG	ROLLED	I690	FTI	10-11-1999	

Total Tubes : 3
Total Records: 6

Attachment 3

2R10 Location and Percent Through Wall Indications

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
17	37	13	AV4	-0.55
17	52	15	AV4	-0.60
		15	AV3	+0.82
		14	AV3	-0.96
		13	AV2	+0.97
		15	AV2	-0.98
		16	AV1	+0.00
17	56	18	AV2	+0.00
17	63	14	AV1	+0.00
		16	AV2	+0.00
		12	AV3	+0.00
19	30	28	AV3	+0.00
		19	AV2	+0.00
		17	AV1	+0.00
19	58	19	AV4	+0.47
		18	AV2	+0.64
19	66	18	AV2	+0.00
		21	AV1	+0.00
		26	AV3	+0.00
21	29	15	AV4	+0.00
		10	AV3	+0.00
21	60	13	AV4	+1.93
		14	AV3	-0.64
		15	AV2	-0.22
23	67	27	AV1	-1.00
		26	AV2	-0.50
		21	AV3	+0.00
23	68	23	AV4	+0.00
		30	AV3	+0.00
		32	AV2	-0.50
		14	AV2	+0.50
23	70	11	AV4	+0.00
24	52	25	AV2	+1.14
		11	AV3	+1.16
24	63	40	AV1	+0.02

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
		14	AV2	+0.24
		16	AV4	-0.24
24	67	12	AV2	+0.00
24	68	27	AV2	+0.00
		24	AV3	+0.00
24	70	13	AV1	+0.00
26	46	15	AV2	+0.28
26	56	32	AV4	+0.00
		24	AV3	+0.00
		18	AV2	+0.00
		25	AV1	+0.00
26	58	24	AV3	-0.66
		14	AV2	-0.60
26	59	13	AV4	+0.53
		12	AV4	-0.45
		21	AV3	+0.32
		19	AV2	+0.00
26	63	10	AV4	+0.00
26	64	26	AV1	-0.27
26	67	17	AV1	+0.06
		12	AV4	+0.00
27	44	21	AV4	+0.86
		34	AV3	+0.39
		34	AV2	-0.04
		10	AV1	-0.62
27	46	26	AV4	-0.48
		33	AV3	+0.26
		31	AV2	+0.28
27	47	31	AV4	-1.48
		38	AV3	-0.78
		19	AV2	-0.88
27	52	26	AV4	+0.00
		24	AV3	+1.21
		38	AV3	-1.14
		24	AV2	+1.06

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
		30	AV2	-1.27
		25	AV1	-2.00
27	56	26	AV4	+0.00
		30	AV3	+0.00
		28	AV2	+0.00
		26	AV1	+0.00
27	64	27	AV3	+0.15
		24	AV2	+0.02
		29	AV1	-0.18
29	46	16	AV4	-0.22
		34	AV3	+0.45
		21	AV2	+0.32
		20	AV1	-0.49
29	57	11	AV4	-0.24
		17	AV3	+0.00
		13	AV2	+0.00
29	65	30	AV4	+0.00
		17	AV3	+0.00
31	64	26	AV2	+0.04
31	67	23	AV2	+0.00
32	39	19	AV4	+0.04
32	48	32	AV3	+0.00
		17	AV2	+0.00
32	49	19	AV3	+1.16
32	51	18	AV4	+1.60
		16	AV3	+1.29
		21	AV3	-1.25
		17	AV2	+1.21
32	54	15	AV3	-0.15
33	41	17	AV4	+0.56
		13	AV2	+0.00
33	55	17	AV3	+0.00
33	60	26	AV3	+0.47
		26	AV1	+0.24
34	36	15	AV3	-0.24

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
		28	AV2	-0.47
		10	AV1	+0.32
34	37	24	AV2	+0.00
		18	AV3	+0.00
		10	AV4	+0.00
		18	AV1	+0.00
34	44	34	AV3	+0.00
		24	AV2	+0.00
34	45	20	AV4	-0.30
		27	AV3	-0.26
		15	AV2	+0.00
34	49	13	AV3	+1.34
		16	AV2	+1.14
		13	AV1	+0.00
34	51	22	AV1	+0.00
34	52	20	AV2	+0.97
34	65	26	AV4	-0.11
		26	AV3	-0.47
		15	AV2	-0.19
35	68	20	AV1	-0.50
		15	AV2	-0.28
35	76	17	02C	-0.02
36	41	21	AV3	+0.00
36	50	11	AV2	+1.01
36	52	19	AV2	-0.70
36	56	27	AV2	+0.00
36	58	19	AV3	-0.43
		15	AV2	+0.43
		17	AV2	-0.47
		13	AV1	+0.19
39	37	27	AV2	-0.15
		22	AV1	+0.28
39	39	10	AV3	+0.00
39	54	14	AV1	+0.00
39	61	33	AV2	+0.00

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
		20	AV1	-0.70
41	58	12	AV1	+0.00

Total Tubes : 63
Total Records: 142

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
16	68	12	AV2	+0.00
18	65	18	AV1	-0.07
		19	AV2	-0.69
		25	AV2	+0.72
		30	AV3	-0.02
		20	AV4	-0.69
22	62	14	AV2	-0.10
22	87	1	01C	+0.08
23	71	16	AV1	+0.00
		10	AV2	+0.02
		14	AV3	+0.28
		10	AV4	+0.35
25	9	16	AV3	-0.12
25	30	18	AV1	+1.69
		25	AV2	+0.00
		32	AV3	+0.00
25	63	16	AV3	+0.00
25	69	18	AV2	+0.00
		32	AV3	+0.00
25	71	19	AV3	+0.06
26	23	11	AV3	+0.07
26	62	30	AV1	+0.00
		22	AV2	-0.02
		22	AV3	+0.00
31	27	20	AV2	-0.11
31	28	23	AV2	+0.00
32	79	18	02C	-0.04
		5	03C	-0.17
33	16	16	03C	+0.00
33	48	39	AV2	+0.00
		34	AV3	+0.00
34	17	39	01C	+0.34
34	32	30	AV1	+0.00
		12	AV2	+0.00
		25	AV3	+0.00

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
34	39	15	AV3	+0.00
34	41	14	AV3	-0.02
34	49	34	AV4	+0.00
34	50	28	AV3	-0.08
		20	AV4	+0.00
		21	AV2	+0.10
34	58	11	AV2	+0.00
35	26	11	AV2	+0.00
36	34	25	AV3	+0.00
40	36	25	AV4	+0.00
40	37	12	AV1	+0.00
		17	AV2	+0.00
40	44	19	AV1	+0.22
		29	AV2	-0.18
40	52	17	AV2	+0.00
42	41	19	02C	-0.06
42	65	32	01C	+0.34
43	37	8	02C	-0.08
43	60	35	02C	-0.06
43	61	5	02C	-0.08
43	64	14	01C	+0.35
43	65	12	02C	+0.10
44	37	12	02C	-0.12
44	38	12	01C	+0.06
44	46	7	02C	+0.16
44	56	39	02C	+0.06
44	58	12	02C	-0.05
44	59	5	02C	-0.08
44	60	10	02C	+0.02
45	41	3	02C	+0.16

Total Tubes : 45
Total Records: 65

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
8	3	11	01C	+0.00
9	3	25	01C	+0.08
12	3	18	01C	-0.06
16	57	19	AV1	+0.00
		13	AV2	+0.00
		20	AV3	+0.00
		15	AV4	+0.00
20	31	11	AV1	+0.00
20	64	14	AV4	+0.00
21	22	15	AV2	+0.00
21	23	11	AV1	+0.00
		10	AV2	+0.00
		12	AV3	+0.00
23	40	11	AV3	+0.00
23	44	10	AV2	+0.00
23	53	13	AV1	+0.71
		17	AV2	-0.07
		28	AV3	-0.18
23	58	15	AV1	+0.00
		26	AV2	+0.00
		32	AV3	+0.00
		12	AV4	+0.00
24	48	10	AV1	+0.00
		11	AV2	+0.00
24	55	14	AV1	+1.09
		10	AV4	-2.75
24	56	21	AV1	-0.68
		18	AV2	-1.07
		18	AV3	+0.73
		24	AV3	-0.78
		18	AV4	-1.44
25	44	15	AV2	+0.00
26	44	23	AV2	+0.00
		24	AV3	+0.00
		19	AV4	+0.00

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
26	45	18	AV1	+0.00
		21	AV2	+0.00
		16	AV4	+0.00
27	51	26	AV1	+0.00
		30	AV2	+0.00
		34	AV3	+0.00
		13	AV4	+0.00
27	59	26	AV1	+0.00
		12	AV2	+0.00
		12	AV4	+0.00
27	63	27	AV1	-0.15
		34	AV2	-0.11
		12	AV3	-0.11
		10	AV4	-0.96
27	64	12	AV1	-0.78
		10	AV2	+0.13
27	65	15	AV4	+1.00
28	10	4	01C	-0.09
28	45	25	AV2	+0.00
30	35	33	AV2	+0.00
		18	AV4	+0.00
30	45	38	AV2	+0.00
		17	AV3	+0.00
		37	AV2	+0.10
30	57	16	AV1	+0.27
30	63	24	AV1	+1.15
		37	AV2	+0.02
		23	AV4	+0.40
		37	AV2	+0.14
31	17	30	01C	-0.25
31	63	11	AV2	+0.00
32	41	19	AV2	+0.00
		28	AV3	+0.00
32	45	39	AV3	+0.05
		29	AV1	+0.00

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
		39	AV2	+0.00
		28	AV4	+0.00
		37	AV2	-0.10
		38	AV3	+0.05
32	59	25	AV3	+0.00
		19	AV4	+0.00
32	61	13	AV1	+0.00
33	26	18	AV1	+0.00
		23	AV2	+0.00
		19	AV3	+0.00
33	52	16	AV1	+0.00
34	38	18	AV3	+0.00
34	52	17	AV4	+0.00
34	54	11	AV4	+0.00
35	53	18	AV3	-0.07
		16	AV4	-0.07
35	54	15	AV4	+0.00
36	44	17	AV4	+0.00
36	45	18	AV3	+0.00
		21	AV4	+0.00
36	63	25	AV2	+0.00
36	71	11	AV2	+0.09
37	19	29	02C	-0.16
37	42	15	AV3	+0.00
		20	AV4	+0.00
37	45	26	AV4	+0.00
37	52	31	AV4	+0.12
38	46	13	AV3	+0.00
		15	AV4	+0.00
38	47	21	AV4	+0.00
		25	AV3	+0.00
38	48	30	AV3	+0.00
39	50	18	AV1	-0.12
		21	AV2	+0.11
39	52	29	AV1	+0.00

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
		23	AV2	+0.00
39	54	20	AV1	+0.00
		33	AV2	+0.00
		36	AV3	+0.00
		38	AV4	+0.00
		37	AV4	-0.05
		35	AV3	+0.02
		32	AV2	-0.05
39	58	26	AV1	+0.00
		24	AV2	+0.00
39	60	13	AV3	+0.00
		18	AV4	+0.00
40	42	33	AV2	+0.00
40	50	27	AV2	+0.00
40	51	16	AV1	+0.00
		26	AV2	+0.00
		13	AV3	+0.00
40	54	33	AV1	+0.00
		21	AV2	+0.00
		22	AV3	+0.00
		29	AV4	+0.00
40	55	20	AV1	+0.00
		37	AV2	+0.00
		39	AV3	+0.00
		39	AV3	+0.00
		37	AV2	+0.30
40	61	21	AV1	+0.00
		41	AV2	+0.00
		42	AV3	+0.00
		39	AV2	+0.22
		41	AV3	+0.13
40	66	22	AV2	+0.00
41	52	18	AV2	+0.00
		23	AV3	-0.09
41	55	28	AV1	-0.71

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
		20	AV1	+0.37
		24	AV2	+0.00
41	60	17	AV2	+0.00
41	65	14	AV2	+0.00
42	50	20	AV1	+0.00
		21	AV2	+0.00
		37	AV3	+0.00
		24	AV4	+0.00
		37	AV3	-0.06
42	52	12	AV1	+0.00
42	60	14	AV3	+0.00
42	65	21	AV2	+0.00
42	67	30	AV1	-0.06
		21	AV2	+0.00
		34	AV3	+0.00
43	63	17	AV2	+0.00
44	33	11	01C	-0.18
44	36	1	01C	-0.24
45	58	18	AV4	+0.00

Total Tubes : 78
Total Records: 159

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
10	3	6	01C	-0.10
15	33	15	AV3	+0.00
17	65	19	AV2	+0.00
18	55	22	AV1	+0.00
		20	AV3	+0.00
		19	AV4	+0.00
		17	AV2	+0.25
21	28	16	AV1	+0.00
		21	AV2	+0.00
		28	AV3	+0.00
		16	AV4	+0.44
22	72	23	AV2	+0.00
23	28	13	AV3	+0.00
23	33	14	AV1	+0.00
		19	AV2	+0.00
		26	AV3	+0.00
23	53	19	AV4	+0.00
23	56	11	AV3	+0.00
		19	AV4	+0.00
23	57	17	AV2	-0.38
		12	AV2	+0.26
		26	AV3	+0.00
		32	AV4	+0.00
23	59	22	AV2	+0.00
		14	AV3	-0.40
		17	AV3	+0.23
		20	AV1	+0.95
23	62	18	AV2	-0.62
		22	AV3	+0.00
		16	AV1	+0.66
		12	AV4	+0.95
23	72	28	AV4	+0.00
24	34	28	AV2	+0.00
		23	AV3	+0.00
		15	AV4	+0.00

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
26	34	20	AV3	+0.00
		21	AV4	+0.00
26	58	22	AV2	+0.00
		26	AV3	+0.00
		13	AV1	+0.00
26	67	19	AV1	+0.00
27	62	11	AV1	+0.70
		19	AV2	+0.00
27	68	31	AV3	-0.24
		28	AV4	+0.00
28	59	16	AV2	+0.00
		10	AV1	+0.00
31	31	36	AV3	+0.00
31	48	16	AV3	+0.00
32	64	18	AV2	+0.00
33	41	10	AV1	+0.00
33	47	19	AV2	+0.66
		26	AV3	-0.52
		22	AV4	+0.09
33	48	12	AV1	+0.26
		18	AV2	-0.05
33	49	17	AV3	+0.00
33	50	15	AV4	+0.00
		10	AV3	+0.00
33	51	32	AV2	-0.78
		16	AV3	-0.78
33	57	13	AV1	+0.00
		36	AV4	+0.00
		19	AV3	+0.00
33	58	22	AV3	+0.00
33	65	15	AV3	+0.00
33	66	31	AV2	+0.00
		15	AV3	+0.00
34	63	28	AV2	+0.00
		18	AV3	+0.00

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
		18	AV4	+0.00
34	65	32	AV3	-0.44
		23	AV4	+0.36
36	63	21	AV3	+0.00
38	39	22	AV4	-0.28
38	52	37	AV4	+0.50
38	67	32	AV2	+0.00
		34	AV3	-0.31
38	68	37	AV2	+0.00
		27	AV3	+0.00
		24	AV4	+0.00
39	49	31	AV4	+0.00
		15	AV3	+0.00
39	65	30	AV1	+0.00
		23	AV2	+0.00
40	37	26	AV1	+0.00
		24	AV2	+0.00
40	56	24	AV1	+0.00
		17	AV2	+0.00
40	57	16	AV4	+0.00
41	35	13	AV1	+0.00
		18	AV2	+0.00
41	53	18	AV1	-0.25
		18	AV2	-0.25
		21	AV3	+0.34
		26	AV4	-0.08
41	57	10	AV1	+0.02
41	59	21	AV4	+0.00
42	33	10	02C	-0.20
42	53	12	AV1	+0.00
		10	AV2	+0.00
42	55	36	AV1	+0.00
		21	AV2	+0.00
42	59	2	02C	-0.09
43	59	11	02C	+0.20

QUERY: QueryM1

ROW	COL	%TW	LOCATION	
43	60	24	02C	-0.09
43	63	23	02C	+0.22
44	35	17	AV1	+0.00
44	55	10	AV4	+0.00
45	46	31	02C	-0.15
45	54	20	AV1	+0.00

Total Tubes : 61
Total Records: 111

Attachment 4

Identification of Tubes Plugged During 2R10

QUERY: QueryM1

ROW	COL	LEG	OUTAGE	CODE
4	18	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
15	13	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
16	35	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
18	9	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
20	35	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
21	28	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
22	42	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
23	34	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
24	63	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG

Total Tubes : 9
Total Records: 18

QUERY: QueryM1

ROW	COL	LEG	OUTAGE	CODE
3	34	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
4	7	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
4	71	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
6	16	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
6	71	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
7	3	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
23	73	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
24	61	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
24	66	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
26	39	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG

Total Tubes : 10
Total Records: 20

QUERY: QueryM1

ROW	COL	LEG	OUTAGE	CODE
2	6	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
2	8	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
2	9	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
2	15	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
2	41	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
18	57	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
39	62	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
40	61	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG

Total Tubes : 8
Total Records: 16

QUERY: QueryM1

ROW	COL	LEG	OUTAGE	CODE
3	12	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
5	72	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
8	7	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
12	52	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
13	52	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
16	5	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
20	52	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
20	57	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
21	52	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
22	37	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
23	47	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
27	47	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
31	13	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
31	37	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
33	27	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
36	26	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
37	22	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
37	34	COLD	04/99 2R10	PLG

QUERY: QueryM1

ROW	COL	LEG	OUTAGE	CODE
		HOT	04/99 2R10	PLG
37	35	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG
41	34	COLD	04/99 2R10	PLG
		HOT	04/99 2R10	PLG

Total Tubes : 20
Total Records: 40

Attachment 5

NDE Techniques Utilized for
1R13 and 2R10

Attachment 5
1R13 NDE TECHNIQUES

Degradation Mechanism and Orientation	SG Location	Probe	EPRI Detection Technique	Detection Qualification Category
Axial PWSCC	Tubesheet Region	+Point	96508	Site
Circ PWSCC	Tubesheet Region	+Point	96508	Site
Axial ODSCC	Tubesheet Region	+Point	96402	Site
Circ ODSCC	Tubesheet Region	+Point	96402	Site
IGA/ODSCC	Sludge Pile region	Bobbin	96008	Site
Pitting in the presence of copper	Above TTS	Bobbin	96005	Site
Axial PWSCC	Freespan with and without dent	+Point	96508	Site
Circ PWSCC	Freespan with and without dent	+Point	96508	Site
Axial PWSCC	Dented TSP	+Point	96508	Site
Circ PWSCC	Dented TSP	+Point	96508	Site
Axial ODSCC	Dented or non-dented TSP	+Point	96402	Site
Circ ODSCC	Dented or non-dented TSP	+Point	96402	Site
IGA/ODSCC	Non-dented TSP	Bobbin	96007	Site
AVB Wear FDB Wear	U-Bend HL or CL	Bobbin Bobbin	96004 96004	Site Site
Axial PWSCC	R1 & R2 U-Bend	+Point	96511	Site
Circ PWSCC	R1 & R2 U-Bend	+Point	96511	Site
Thinning	Non Dented TSP	Bobbin	96001	Site
Wear at Supports and Loose Part	Anywhere	Bobbin +Point	96004	Site
Freespan MBMS	Anywhere	Bobbin +Point	NA	Non-Qualified

Attachment 5
2R10 NDE TECHNIQUES

Degradation Mechanism and Orientation	SG Location	Probe	EPRI Detection Technique	Detection Qualification Category
Axial PWSCC	Tubesheet Region	+Point Bobbin	96508 96006	Site Qualified
Circ PWSCC	Tubesheet Region	+Point	96508	Site
Axial ODSCC	Tubesheet Region	+Point	96402	Site
Circ ODSCC	Tubesheet Region	+Point	96402	Site
IGA/ODSCC	Sludge Pile region	Bobbin	96008	Site
Pitting in the presence of copper	Above TTS	Bobbin	96005	Site
Axial PWSCC	Freespan with and without dent	+Point	96508	Qualified
Circ PWSCC	Freespan with and without dent	+Point	96508	Qualified
Axial PWSCC	Dented TSP	+Point Bobbin	96508 96012	Site Site
Circ PWSCC	Dented TSP	+Point	96508	Site
Axial ODSCC	Dented or non-dented TSP	+Point	96402	Site
Circ ODSCC	Dented or non-dented TSP	+Point	96402	Qualified
IGA/ODSCC	Non-dented TSP	Bobbin	96007	Site
AVB Wear	U-Bend	Bobbin	96004	Site
Axial PWSCC	R2 U-Bend	+Point	96511	Site
Circ PWSCC	R2 U-Bend	+Point	96511	Site
Cold Leg Thinning	Cold Leg TSP	Bobbin	96001	Site
TSP Ligament (missing or cracked)	TSP	Bobbin +Point	NA	Non-Qualified
Loose Part	Anywhere	Bobbin +Point	NA	Non-Qualified
Freespan	Anywhere	Bobbin +Point	NA	Non-Qualified
I-690 plugs	I-690 HL plugs	+ Point	NA	Non-Qualified

U.S. NUCLEAR REGULATORY COMMISSION

DIRECTIVE TRANSMITTAL

TN: DT–99–18

To:	NRC Management Directives Custodians
Subject:	Transmittal of Directive 8.11, "Review Process for 10 CFR 2.206 Petitions"
Purpose:	Directive and Handbook 8.11 are being revised to address stakeholder feedback, to make the 2.206 review process more timely and effective, and to facilitate increased petitioner-staff communication and interaction.
Office and Division of Origin:	Office of Nuclear Reactor Regulation
Contact:	Herbert N. Berkow, 415-1485 or Gordon Edison, 415-1448
Date Approved:	September 23, 1994 (**Revised: July 1, 1999**)
Volume:	8 Licensee Oversight Programs
Directive:	8.11 Review Process for 10 CFR 2.206 Petitions
Availability:	Rules and Directives Branch Office of Administration David L. Meyer, (301) 415-7162 or Jeannette P. Kiminas (301) 415-7086

Significant Changes to Management Directive 8.11 Review Process for 10 CFR 2.206 Petitions

The entire document has been revised to improve clarity, remove redundancy and reflect current organizations and administrative practices. The significant changes to be noted are as follows:

- Replace current informal public hearing process with a staff–petitioner–licensee meeting, similar in format to staff–licensee meetings.
- Offer all petitioners an opportunity to make a 30–minute presentation to the petition review board (PRB).
- The acknowledgment letter must be issued within 5 weeks from the date of petition, rather than 4 weeks, and will include a copy of MD 8.11.
- Periodic PRB meetings will be held, in addition to the initial meeting, if appropriate.
- The goal of issuing a director's decision within 120 days from the acknowledgment letter applies only when the review schedules are within the staff's control.
- The revised process requires significantly improved communications between the petition manager and the petitioner, early on and throughout the process.
- Petitioners are added to the service lists on affected dockets.
- Acknowledgment letters and director's decision transmittal letters will have a friendlier and more positive tone, stressing the actions the staff has taken to address the petitioner's concerns, even when the petition is denied.

Review Process for 10 CFR 2.206 Petitions

Directive 8.11

Contents

Review Process for 10 CFR 2.206 Petitions Directive 8.11

Policy
(8.11–01)

It is the policy of the U.S. Nuclear Regulatory Commission under Section 2.206 of Title 10 of the *Code of Federal Regulations* (10 CFR 2.206) to provide members of the public with the means to request action to enforce NRC requirements. The Commission may deny or grant a request for enforcement action, in whole or in part, and may take action that satisfies the safety concerns raised by the requester, even though it is not necessarily an enforcement action. Requests that raise health and safety and other issues without requesting enforcement action will be reviewed by means other than the 10 CFR 2.206 process.

Objectives
(8.11–02)

- To provide the public with a means to bring to the NRC's attention potential health and safety issues requiring NRC enforcement action. (021)
- To ensure the public health and safety through the prompt and thorough evaluation of any potential safety problem addressed by a petition filed under 10 CFR 2.206. (022)
- To provide for appropriate participation by the petitioners and the public in NRC's decision-making activities related to the 10 CFR 2.206 petition process. (023)
- To ensure effective communication with the petitioner on the status of the petition, including providing relevant documents and notification of NRC and licensee interactions on the petition. (024)

Organizational Responsibilities and Delegations of Authority
(8.11–03)

Executive Director for Operations (EDO)
(031)

Receives and assigns action for all petitions filed under 10 CFR 2.206.

Director, Office of the Chief Information Officer (OCIO)
(032)

Provides hardware, software, and communication services support of the NRC Home Page for making information publicly available on the status of the petitions.

Office of the General Counsel (OGC)
(033)

- Provides legal review and advice on 10 CFR 2.206 petitions and director's decisions upon specific request from the staff in special cases or where the petition raises legal issues. (a)
- Gives legal advice to the EDO, office directors, and staff on relevant 2.206 matters. (b)

Office Directors (or Designees)
(034)

- Have overall responsibility for assigned petitions. (a)
- Approve or deny a petitioner's request for immediate action. (b)
- Sign all acknowledgment letters and director's decisions. (c)
- Determine whether criteria for a meeting with the petitioner and licensee are met, and notify the Commission, through the EDO, once a determination is made that a 2.206 petition meets the criteria for a meeting. (d)

Office Directors (or Designees)
(034) (continued)

- Provide up-to-date information for the monthly status report on all assigned petitions, including the total number of staff hours expended on each open petition; provide this information to the agency coordinator who, in turn, ensures that the information is made publicly available in the Public Document Room and on the NRC Home Page. (e)
- Appoint a petition review board chairperson. (f)
- Designate a petition manager for each petition. (g)
- Concur, as appropriate, in each extension request from the petition manager and forward the extension request to the Office of the EDO (OEDO) for approval. (h)
- Promptly notify the Office of Investigations (OI) of any allegations of suspected wrongdoing by a licensee, or the Office of the Inspector General (OIG) of suspected wrongdoing by an NRC staff person or NRC contractor, that are contained in the petitions they may receive. (i)
- Obtain review and concurrence from the Office of Enforcement for proposed director's decisions that involve potential enforcement implications. (j)
- Ensure that the director's decision and the supporting evaluation of the petition adequately reflects information presented at any meetings with the petitioner, to the extent that such information was useful. (k)

Regional Administrators
(035)

- Refer any 2.206 petitions they may receive to the EDO. (a)
- Promptly notify OI of any allegations of suspected wrongdoing by a licensee, or OIG of suspected wrongdoing by an NRC staff person or NRC contractor, that are contained in the petitions they may receive. (b)
- As needed, provide support and information for the preparation of an acknowledgment letter and/or a director's decision on a 2.206 petition. (c)
- Make the petition manager aware of information that is received or that is the subject of any correspondence relating to a pending petition. (d)

2.206 Petition Review Board Chairperson
(Each program office has a board chairperson, generally an SES manager.)
(036)

- Chairs petition review board meetings. (a)
- Ensures appropriate review of all new petitions in a timely manner. (b)
- Ensures appropriate documentation of petition review board meetings. (c)
- Chairs periodic meetings with the petition managers to discuss the status of open petitions and to provide guidance for timely issue resolution. (d)

Director, Division of Licensing Project Management, Office of Nuclear Reactor Regulation (NRR)
(037)

Appoints the Agency 2.206 Coordinator, NRR, who prepares monthly reports to the EDO on petition status, age, and resource expenditures for the signature of the Associate Director for Project Licensing and Technical Analysis.

Applicability
(8.11–04)

The policy and guidance in this directive and handbook apply to all NRC employees.

Handbook
(8.11–05)

Handbook 8.11 details the procedures for staff review and disposition of petitions submitted under Section 2.206.

Definitions
(8.11–06)

A 10 CFR 2.206 Petition. A written request filed by any person to institute a proceeding to modify, suspend, or revoke a license, or for any other enforcement action that may be proper and that meets the criteria for review under 10 CFR 2.206 (see Part II of Handbook 8.11).

Definitions
(8.11–06) (continued)

A 10 CFR 2.206 Petition Meeting. A meeting open to the public and held by NRC staff to provide an opportunity to the petitioner and licensee to supply information to assist NRC staff in the evaluation of petitions that raise new, significant safety issues, as defined in Part II(D)(3)(a) of Handbook 8.11, or that provide new information or approaches for the evaluation of significant safety issues previously evaluated.

References
(8.11–07)

Code of Federal Regulations—

10 CFR 2.206, "Requests for Action Under this Subpart."

10 CFR 2.790, "Public Inspections, Exemptions, Requests for Withholding."

Nuclear Regulatory Commission—

Enforcement Manual, "General Statement of Policy and Procedure for NRC Enforcement Actions," Office of Enforcement, NUREG-1600.

Investigative Procedures Manual, Office of Investigations, revised August 1996.

Management Directive (MD) 3.5, "Public Attendance at Certain Meetings Involving the NRC Staff."

— MD 8.8, "Management of Allegations."

— MD 12.6, "NRC Sensitive Unclassified Information Security Program."

Memorandum of Understanding Between the NRC and the Department of Justice, December 12, 1988.

"Nuclear Regulatory Commission Issuances," published quarterly as NUREG-0750.

Review Process for 10 CFR 2.206 Petitions

Handbook 8.11

Contents

Contents (continued)

Part I

Initial Staff Actions

Introduction (A)

Title 10 of the *Code of Federal Regulations*, Section 2.206 (1)

This section of the regulations has been a part of the Commission's regulatory framework since the Commission was established in 1975. Section 2.206 permits any person to file a petition to request that the Commission institute a proceeding to take enforcement action. (a)

The petition must request that a license be modified, suspended, or revoked, or that other appropriate enforcement action be taken and must provide sufficient facts that constitute the bases for taking the particular action. (b)

Section 2.206 provides a procedure that allows any person to file a request to institute a proceeding for enforcement action and requires that the petition be submitted in writing and provide sufficient grounds for taking the proposed action. Do not treat general opposition to nuclear power or a general assertion of a safety problem, without supporting facts, as a formal petition under 10 CFR 2.206. Treat general requests as routine correspondence. (c)

NRC's Receipt of a Petition (2)

After NRC receives a petition, it is assigned to the director of the appropriate office for evaluation and response. The official response is a written decision of the office director that addresses the issues raised in the petition. The director's decision can grant, partially grant, or deny the petition. The Commission may, on its own initiative, review the director's decision (to determine if the director has abused his or her discretion), but no petition or other request for Commission review of the director's decision will be entertained by the Commission.

Introduction (A) (continued)

NRC Home Page (3)

The NRC Home Page provides the up-to-date status of pending 2.206 petitions, director's decisions issued, and notices of meetings. The NRC external home page is accessible via the World Wide Web, and documents may be found at *http://www.nrc.gov/NRC/PUBLIC/2206/index.html*. Director's decisions are published in NRC Issuances (NUREG-0750).

Assignment of Staff Action and 2.206 Petition Review Board (B)

Office of the Executive Director for Operations (OEDO) (1)

The OEDO assigns the petition to the appropriate office for action. The original incoming is sent to the office and a copy of the petition is sent to the Office of the General Counsel (OGC).

Agency 2.206 Coordinator, Office of Nuclear Reactor Regulation (NRR) (2)

The Agency 2.206 Coordinator, NRR (appointed by the Director, Division of Licensing Project Management), receives copies of all 2.206 petitions from OEDO and prepares the 2.206 periodic status report.

Assigned Office (3)

The office director of the assigned office designates a petition manager and an office petition review board chairperson for each petition. The petition manager drafts the acknowledgment letter and *Federal Register* notice (see Exhibits 1 and 2 of this handbook). The petition manager ensures that the petition is placed in the public document room after it is determined that the petition does not contain allegations or sensitive information. A petition review board meets within 3 weeks of receipt of the petition. Each assigned office conducts at least one review board meeting for each petition. The petition review board consists of—(a)

- A petition review board chairperson (SES manager or above) (i)
- A petition manager (ii)
- Cognizant technical review branch chief(s), as necessary (iii)
- An Office of Enforcement (OE) or Office of Investigations (OI) representative, as needed (iv)

In addition, OGC normally will participate. (b)

Assignment of Staff Action and 2.206 Petition Review Board (B) (continued)

Assigned Office (3) (continued)

The purpose of the petition review board meeting is to—(c)

- Determine whether the petitioner's request meets the criteria defined in 10 CFR 2.206 (see Part II(A) of this handbook) (i)
- Determine whether the petition meets the criteria for a meeting with the petitioner and licensee (see Part II(C) of this handbook) (ii)
- Promptly address any request for immediate action (iii)
- Address the possibility of issuing a partial director's decision (iv)
- Draft a schedule for responding to the petitioner so that a commitment is made by management and the technical review staff to respond to the petition in a timely manner (see Part IV(A) of this handbook) (v)
- Determine whether the petition is sufficiently complex that additional review board meetings should be scheduled to ensure that suitable progress is being made (vi)

The appointed petition review board chairperson for each office—(d)

- Chairs and coordinates 2.206 petition review board meetings for the assigned office (i)
- Ensures the 2.206 petition review board meetings are documented (ii)

Assigned Office Action (C)

Office Director (1)

The assigned office director signs and issues the acknowledgment letter and the *Federal Register* notice. This action should be completed by the date specified by OEDO for the action. (a)

The office director, or designee, ensures that the appropriate licensee is sent a copy of the acknowledgment letter and a copy of the incoming request at the same time as the petitioner. If appropriate, the licensee will be requested to provide a response to the NRC on the issues specified in the petition, usually within 30 days. (b)

Assigned Office Action (C) (continued)

Office Director (1) (continued)

When an unannounced technical inspection or an OI investigation is involved, the office director makes the decision to release information to the licensee in a manner to ensure that the staff does not release information that would indicate to the licensee or the public that an unannounced inspection or investigation will be undertaken or information that would undermine the inspection or investigation. (c)

The office director carefully considers any potential conflict or loss of objectivity that might result from assigning the same staff who were previously involved with the issue that gave rise to the petition. (d)

Petition Manager (2)

The petition manager—(a)

- Briefs the petition review board on the petitioner's request(s), any background information, the need for an independent technical review, and a proposed plan for resolution, including target completion dates (i)
- Promptly advises the licensee of the petition, sends the licensee a copy of the petition, and places the petition and all subsequent related correspondence in the Public Document Room. (ii)
- Drafts the acknowledgment letter and *Federal Register* notice, serves as the NRC point of contact with the petitioner, provides updates to the periodic 2.206 status report to the Executive Director for Operations (EDO), and monitors the progress of any OI investigation and related enforcement actions (iii)
- Prepares the director's decision on the petition for the office director's consideration, including coordination with the appropriate staff supporting the review (iv)
- Ensures appropriate documentation of all 10 CFR 2.206 petition determinations, including the determination on whether a meeting is offered (v)

The petition manager ensures that a copy of this management directive is included with the acknowledgment letter. The acknowledgment letter also should include the name and telephone number of the petition manager and identify the technical staff organizational units that will participate in the review. (b)

Assigned Office Action (C) (continued)

Petition Manager (2) (continued)

The acknowledgment letter, as well as the transmittal letter for the director's decision or partial director's decision, should acknowledge the petitioner's efforts in bringing issues to the staff's attention. (c)

If appropriate, the decision transmittal letter should acknowledge that the petitioner identified valid issues and should specify the corrective actions that have been or will be taken to address these issues, notwithstanding that some or all of the petitioner's specific requests for action have not been granted. (d)

The petition manager places the petitioner on distribution for all relevant NRC correspondence to the licensee to ensure that the petitioner receives copies of all NRC correspondence with the licensee pertaining to the petition. If there is a service list(s) add the petitioner to the list(s) for all headquarters and regional documents on the affected dockets. Remove the petitioner's name from distribution and/or the service list(s) 90 days after issuance of the director's decision. The petition manager sends licensee-prepared documents submitted to the NRC that are relevant to the petition to the petitioner for the same duration as staff-generated documents. If the licensee is asked to respond, the petition manager advises the licensee that the NRC intends to place the licensee's response in the Public Document Room and provide the response to the petitioner. (e)

Unless necessary for NRC's proper evaluation of the petition, the licensee should avoid using proprietary or personal privacy information that requires protection from public disclosure. If such information is necessary to properly respond to the petition, the petition manager ensures the information is protected in accordance with 10 CFR 2.790. (f)

The petition manager also ensures that the petitioner is placed on distribution for other NRC correspondence relating to the issues raised in the petition, including relevant generic letters or bulletins that are issued during the pendency of the NRC's consideration of the petition. This does not include NRC correspondence or documentation related to an OI investigation, which will not be released outside NRC without the approval of the Director, OI. (g)

Assigned Office Action (C) (continued)

Petition Manager (2) (continued)

Before the petition review board meeting, the petition manager informs the petitioner that the 2.206 petition process is a public process in which the petition and all the information in it will be made public. If the petitioner requests anonymity and that the petition not be made public, advise the petitioner that, because of its public nature, the 2.206 process cannot provide protection of the petitioner's identity. In such cases, advise the petitioner that the matter will be handled as an allegation and that the petitioner should withdraw the petition in writing. During this telephone contact, offer the petitioner an opportunity to have one representative give a presentation to the petition review board. The petitioner (or representative) may participate in person or by teleconference on a recorded line and only for the purpose of explaining the requested actions, their bases, and answering staff questions. The presentation will be limited to about a half hour and will be transcribed. Treat the transcription as a supplement to the petition and send a copy of the transcription to the petitioner and to the same distribution as the original petition. (h)

If the petition contains a request for immediate enforcement action by the NRC, such as a request for immediate suspension of facility operation until final action is taken on the request, the acknowledgment letter must respond to the immediate action requested. If the immediate action is denied, the staff must explain the basis for the denial in the acknowledgment letter. If the staff plans to take an action that is contrary to an immediate action requested in the petition before issuing the acknowledgment letter (such as permitting restart of a facility when the petitioner has requested that restart not be permitted), the petition manager must promptly notify the petitioner by telephone of the pending staff action. The petitioner will not be advised of any wrongdoing investigation being conducted by OI. (i)

In cases where the staff identifies certain issues in a petition that it believes are more appropriately addressed using the allegation process, the petition manager advises the petitioner of this staff view during the initial telephone contact and suggests to the petitioner that he or she withdraw those issues from the petition with the understanding that they will be addressed through the allegation process. (j)

Assigned Office Action (C) (continued)

Petition Manager (2) (continued)

All telephone contacts with the petitioner will be documented by a memorandum to file, which becomes part of the petition file. (k)

OGC Staff Attorney (3)

OGC normally participates in the petition review board meetings for the 2.206 petition and provides legal review and advice on 10 CFR 2.206 petitions and director's decisions upon specific request from the staff in special cases or where the petition raises legal issues. OGC may be assigned as the responsible office for the review, if appropriate.

Reporting Requirements and Updating the Status of Petitions on the NRC Home Page (D)

On a monthly basis, the Agency 2.206 Coordinator, NRR, will contact all petition managers reminding them to prepare a status report on 2.206 petitions in their office. This report will be made available in the PDR and placed on the NRC Home Page. The petition managers should electronically mail the status report for each open petition, with the exception of sensitive information as described below, to PETITION. The Agency 2.206 Coordinator combines all the status reports, including staff performance metrics for petitions processed under 10 CFR 2.206 for the current year, in a monthly report to the EDO from the Associate Director, Project Licensing and Technical Analysis, and provides a copy of the report to the Web operator for placement on the NRC Home Page. (1)

If the information on the status of the petition is sensitive information that may need to be protected from disclosure (e.g., safeguards or facility security information, proprietary or confidential commercial information, information relating to an ongoing investigation of wrongdoing or enforcement actions under development, or information about referral of matters to the Department of Justice), the petition manager and Agency 2.206 Coordinator should ensure that this information is protected from disclosure. Sensitive information should be handled in accordance with Management Directive 12.6, "NRC Sensitive Unclassified Information Security Program." (2)

Part II

Criteria for Petition Evaluation

Use the criteria discussed in this part for determining whether a petition should be considered under 10 CFR 2.206, if similar petitions should be consolidated, and if a public meeting should be offered.

Criteria for Reviewing Petitions Under 10 CFR 2.206 (A)

Review a petition under the requirements of 10 CFR 2.206 if the request meets all of the following criteria: (1)

- The petition contains a request for enforcement action: either requesting that NRC impose requirements by order; or issue an order modifying, suspending, or revoking a license; or issue a notice of violation, with or without a proposed civil penalty. (a)

- The enforcement action requested and the facts that constitute the bases for taking the particular action are specified. The petitioner must provide some element of support beyond the bare allegation. The supporting facts must be credible and sufficient to warrant further inquiry. (b)

- Acceptance for review under 10 CFR 2.206 will not result in circumventing an available proceeding in which the petitioner is or could be a party. (c)

If a petition meets the criteria but does not specifically cite 10 CFR 2.206, the petition manager will attempt to contact the petitioner by telephone to determine if the individual wants the request processed pursuant to 10 CFR 2.206. If the petition is unclear or appears to be marginal in meeting the criteria for review, the petition manager will encourage and facilitate a presentation to the petition review board by the petitioner so that the concerns can be clarified. (2)

Criteria for Rejecting Petitions Under 10 CFR 2.206 (B)

Do not review a petition under 10 CFR 2.206, whether specifically cited or not, under the following circumstances: (1)

- The incoming correspondence does not ask for an enforcement action or fails to provide sufficient facts to support the petition but simply alleges wrongdoing, violations of NRC regulations, or existence of safety concerns. The request cannot be simply a general statement of opposition to nuclear power or a general assertion without supporting facts (e.g., the quality assurance at the facility is inadequate). These assertions will be treated as allegations and referred for appropriate action in accordance with Management Directive (MD) 8.8, "Management of Allegations." (a)
- The petitioner raises issues that already have been the subject of NRC staff review and evaluation either on the cited facility, other plant facilities, or on a generic basis, for which a resolution has been achieved, the issues have been dispositioned, and the resolution is applicable to the facility in question. (b)
- The request is to reconsider or reopen a previous enforcement action (including a decision not to initiate an enforcement action) or a director's decision and will not be treated as a 2.206 petition unless it presents significant new information. (c)
- The request is to deny a license application or amendment. This type of request should initially be addressed in the context of the relevant licensing action, not under 10 CFR 2.206. (d)

If a petitioner's request does not meet the criteria for consideration under 10 CFR 2.206, a letter will be sent to the petitioner explaining why the request is not being reviewed under 10 CFR 2.206 (see Exhibit 3). (2)

Criteria for Consolidating Petitions (C)

All requests submitted by different individuals will, as a general practice, be treated and evaluated separately. When two or more petitions request the same action, specify the same bases, provide adequate supporting information, and are submitted at about the same time, the petition review board considers the benefits of consolidating the petitions against the potential of diluting the importance of any petition and recommends whether or not consolidation is appropriate. The assigned office director determines whether or not to consolidate the petitions.

Criteria for Meetings (D)

For petitions meeting the criteria specified in this section, the staff offers the petitioner an opportunity for a meeting. A meeting, which is a resource for the staff in evaluating the petition, also affords the petitioner and the licensee an opportunity for enhanced involvement in the Commission's decision-making process. (1)

A meeting is not automatically granted and will not be offered simply at the petitioner's request. If the staff offers the petitioner the opportunity for a meeting, the petitioner then has the option to accept or reject the offer. If the petitioner rejects the offer, a meeting will not be conducted and the petition review will continue. If the petitioner accepts the offer of a meeting, the licensee will be invited to participate in the meeting. (2)

The staff uses the following criteria to determine if an opportunity for a meeting is to be offered to the petitioner. Either one of the two elements listed below must be met. (3)

- The petition raises the potential for a significant safety issue. For nuclear reactors and nuclear material licensees, a significant safety issue is an issue that could lead to a significant exposure, could cause significant core damage, or could otherwise result in a significant reduction of protection of public health and safety. The information is considered "new" if one the following applies: (a)
  - The petition presents a significant safety issue not previously evaluated by the staff. (i)
  - The petition presents significant new information on a significant safety issue previously evaluated. (ii)
  - The petition presents a new approach for evaluating a significant safety issue previously evaluated and, on preliminary assessment, the new approach appears to have merit and to warrant reevaluation of the issue. (iii)
- The petition alleges violations of NRC requirements involving a significant safety issue for which new information or a new approach has been provided, and it presents reasonable supporting facts that tend to establish that the violation occurred. (b)

Criteria for Meetings (D) (continued)

A meeting will not be held if to do so will compromise "sensitive" information that may need to be protected from disclosure, such as safeguards or facility security information, proprietary or confidential commercial information, or information relating to an ongoing investigation of wrongdoing. The petition manager ensures that a meeting will not compromise the protection of this information before offering the petitioner the opportunity for a meeting. A meeting also will not be held simply because the petitioner claims to have additional information and will not present it in any other forum. (4)

Part III

Procedures for Conducting a 10 CFR 2.206 Petition Meeting

After the staff determines that a petition meets the criteria for a meeting, set forth in Part II (D) of this handbook, and the petitioner accepts the offer of a meeting, the petition manager contacts the petitioner to schedule a mutually agreeable date for the meeting. The petition manager also requests the licensee to participate in the meeting to present its position and coordinates the schedules and dates with the licensee. The meeting must be scheduled so as not to adversely impact the established petition review schedule.

Meeting Location (A)

Meetings normally will be held at NRC headquarters in Rockville, Maryland, with provisions for participation by telephone or video link. If justified by special circumstances, the staff may hold the meeting at some location other than NRC headquarters.

Notice of Meeting (B)

Provisions for a meeting notice will be made in accordance with agency policy. The NRC petition manager will ensure that a copy of the meeting notice is placed on the NRC Home Page, that the scheduled meeting is included in the Public Meeting Notice System, that the Office of Public Affairs is notified of the meeting, and that the meeting notice is communicated to the petitioner. (1)

All meetings are transcribed, and the transcripts are publicly available. (2)

Meeting Chairperson (C)

The meeting is chaired by the NRC office director responsible for addressing the petition, or by his or her designee. (1)

The purpose of the meeting is to obtain additional information from the petitioner and the licensee for NRC staff use in evaluating the petition. It is not a forum for the staff to offer any preliminary decisions on the evaluation of the petition. The chairperson has final authority to determine the conduct of the meeting. Members of the public may attend as observers. (2)

Meeting Format (D)

The meeting chairperson provides a brief summary of the 2.206 process, the purpose of the meeting, and the petition. Following the opening statement—(1)

- The petitioner is allowed a reasonable amount of time (approximately 30 minutes) to articulate the basis for the petition. (a)
- NRC staff have an opportunity to ask the petitioner questions for purposes of clarification. (b)
- The licensee is then allowed a reasonable amount of time (approximately 30 minutes) to address the issues raised in the petition. (c)
- NRC staff have an opportunity to ask the licensee questions for purposes of clarification. (d)

Part IV
Further Staff Actions

General (A)

Schedule (1)

The assigned office holds a petition review board meeting on the submitted 2.206 petition within 3 weeks of receipt of the petition. The review board helps determine the appropriate schedule as well as how best to respond to the petitioner's concerns. (a)

The goal is to issue the director's decision, or partial director's decision, within 120 days from the date of issuance of the acknowledgment letter. The Office of the Executive Director for Operations (OEDO) tracks the target date, and any change of the date requires approval by the OEDO. Enforcement actions that are prerequisites to a director's decision must be expedited and completed in time to meet the the 120-day goal. Investigations by the Office of Investigations (OI) should be expedited to the extent practicable. However, the goal of issuing a full, or partial, director's decision within 120 days after issuing the acknowledgment letter applies only to petitions whose review schedules are within the staff's control. If issues in a petition are the subject of an extended OI investigation, or a referral to the Department of Justice (DOJ), or if NRC decides to await a Department of Labor (DOL) decision, a partial director's decision is issued within 120 days, and the 120-day goal is not applied to the remainder of the petition. When more time is needed (e.g., when issues in a petition are the subject of an extended OI investigation, or a referral to DOJ, or if NRC decides to await a DOL decision), the assigned office director determines the need for an extension of the schedule and requests the extension from the OEDO. (b)

General (A) (continued)

Schedule (1) (continued)

If the director's decision cannot be issued in 120 days, the petition manager promptly contacts the petitioner explaining the reason(s) for the delay and maintains a record of such contact. If the delay results from an ongoing OI investigation, the petition manager contacts the Director, OI, to obtain approval for citing the OI investigation as the reason for the delay. (c)

If there is alleged wrongdoing on the part of licensees, their contractors, or their vendors, immediately notify OI. If there is alleged wrongdoing involving an NRC employee, NRC contractors, or NRC vendors, immediately notify the Office of the Inspector General (OIG). (d)

Petition Review Board Actions (2)

The petition review board ensures that an appropriate petition review process is followed. This includes recommending whether or not: (a)

- The submittal qualifies as a 2.206 petition. (i)
- The petitioner should be offered or informed of an alternative process (e.g., consideration of issues as allegations, consideration of issues in a pending license proceeding, or conduct of an inspection). (ii)
- The petition should be consolidated with another petition. (iii)
- A public meeting should be offered. (iv)
- Referral to OI or OIG is appropriate. (v)
- There is a need for additional review board meetings. (vi)
- There is a need for the Office of the General Counsel (OGC) to participate in the review. (vii)
- An adequate review schedule and technical review participation have been established. (viii)
- Any petitioner's request for immediate action should be granted or denied. (ix)
- The licensee should be requested to respond to the petition. (x)
- A partial director's decision should be issued. (xi)

General (A) (continued)

Petition Manager Actions (3)

The petition manager drafts the acknowledgment letter and *Federal Register* notice and coordinates all information required from the professional staff within his or her organization and other organizations and from OI if a wrongdoing issue is under consideration. The petition manager also advises his or her management of the need for OGC review and advice regarding a petition in special cases. An Associate Director of the Office of Nuclear Regulation (NRR), a Division Director in the Office of Nuclear Material Safety and Safeguards (NMSS), or the Director of the Office of Enforcement(OE) makes a request for OGC involvement to the OGC special counsel assigned to 2.206 matters. (a)

The petition manager ensures that the petitioner is notified at least every 60 days of the status of the petition, or more frequently if significant actions occur. The petition manager makes the bimonthly status reports by telephone and should not leave a message on a voice mail message system unless repeated efforts to contact the petitioner are unsuccessful. The petition manager keeps up-to-date on the status of the petition so that reasonable detail can be provided with the status reports. However, the status report to the petitioner will not indicate—(b)

- An ongoing OI investigation, unless approved by the Director, OI (i)
- The referral of the matter to DOJ (ii)
- Enforcement action under consideration (iii)

The petition manager also will make the following telephone contacts with the petitioner: (c)

- Within 1 week after receipt of the petition and before the petition review board meeting, contact the petitioner to explain the public nature of the 2.206 petition process. During this contact, offer the petitioner an opportunity to have one representative give a presentation to the petition review board. The petitioner (or representative) may participate in person or by teleconference on a recorded line and only for the purpose of explaining the requested actions, their bases, and answering staff questions. The presentation will be limited to about a half hour and will be transcribed. Treat the transcription as a supplement to the petition and send a copy of the transcription to the petitioner and to the same distribution as the original petition. (i)

General (A) (continued)

Petition Manager Actions (3) (continued)

- After the petition review board meets, and before issuance of the acknowledgment letter, inform the petitioner as to whether or not the petition qualifies as a 2.206, disposition of any requests for immediate action, how the review will proceed, and that an acknowledgment letter is coming. (ii)

- Before dispatching the director's decision (or partial decision), inform the petitioner of the imminent issuance of the decision and the substance of the decision. (iii)

- When the director's decision has been signed, promptly send a copy electronically or by fax, if possible, to the petitioner. (iv)

Director's Decision (B)

The staff normally prepare a partial director's decision when some of the issues associated with the 2.206 petition are resolved in advance of other issues and if significant schedule delays are anticipated before resolution of the entire petition. If a wrongdoing investigation is being conducted in relation to the petition, the staff consider the results of the OI investigation, if available, in completing the action on the petition. (1)

Management Directive 8.8, "Management of Allegations," provides agency policy with regard to notifying OI of wrongdoing matters, as well as initiating, prioritizing, and terminating investigations. The petition manager should become familiar with the current version of this directive and follow the policy outlined therein when dealing with issues requiring OI investigations. (2)

All information related to an OI wrongdoing investigation, or even the fact that an investigation is being conducted, will receive limited distribution within NRC and will not be released outside NRC without the approval of the Director, OI. Within NRC, access to this information is limited to those having a need-to-know. Regarding a 2.206 petition, the assigned office director, or his designee, maintains copies of any documents required and ensures that no copies of documents related to an OI investigation are placed in the docket file, the agency's document management system, or the Public Document Room (PDR), without the approval of the Director, OI. (3)

Director's Decision (B) (continued)

The petition manager submits the completed draft decision to his or her management for review. After management's review, the petition manager incorporates any proposed revisions in the decision. If the decision is based on or references a completed OI investigation, OI must concur in the accuracy and characterization of the OI findings and conclusions that are used in the decision. (4)

If appropriate, the petition manager obtains OE management's review of and concurrence in the draft director's decision for potential enforcement implications. (5)

Granting the Petition (C)

Upon granting the petition, in whole or in part, the petition manager prepares a "Director's Decision Under 10 CFR 2.206" for the office director's signature. The decision explains the bases upon which the petition has been granted and identifies the actions that NRC staff have taken or will take to grant all or that portion of the petition. The Commission may grant a request for enforcement action, in whole or in part, and also may take action to satisfy the safety concerns raised by the petition, although such action is not necessarily an enforcement action. A petition is characterized as being granted in part when NRC did not grant the action as asked but took other action to address the underlying safety problem. If the petition is granted in full, the director's decision explains the bases for granting the petition and states that the Commission's action resulting from the director's decision is outlined in the Commission's order or other appropriate communication. (1)

If the petition is granted by issuing an order, the petition manager prepares a letter to transmit the order to the licensee. He or she prepares another letter to explain to the petitioner that the petition has been granted and encloses a copy of the order. Copies of the director's decision and *Federal Register* notice to be sent to the licensee and individuals on the service list(s) are dispatched simultaneously with the petitioner's copy. (2)

Denying the Petition (D)

Upon denial of the petition, in whole or in part, the petition manager prepares a "Director's Decision Under 10 CFR 2.206" for the office director's signature. The decision explains the bases for the denial and discusses all matters raised by the petitioner in support of the request. If appropriate, the decision transmittal letter acknowledges that

Denying the Petition (D) (continued)

the petitioner identified valid issues and specifies the corrective actions that have been or will be taken to address these issues, notwithstanding that some of all of the petitioner's specific requests for action have not been granted. The office director sends a letter to the petitioner transmitting the director's decision, along with a *Federal Register* notice explaining that the request has been denied. (1)

If an OI investigation is completed either before granting or denying the petition, the petition manager contacts OI and OE to coordinate NRC's actions when the wrongdoing matter has been referred to DOJ. It may be necessary to withhold action on the petition in keeping with the memorandum of understanding with DOJ. (2)

Issuance of Director's Decision (E)

A decision under 10 CFR 2.206 consists of a letter to the petitioner, the director's decision, and the *Federal Register* notice. The petition manager or administrative staff contacts the Office of the Secretary (SECY) to obtain a director's decision number (i.e., DD-YEAR-00). A director's decision number is assigned to each director's decision in numerical sequence. This number is typed on the letter to the petitioner, the director's decision, and the *Federal Register* notice. Note that the director's decision itself is not published in the *Federal Register*; only the notice of its availability, containing the substance of the decision, is published (see Exhibit 4). (1)

The assigned office director signs the *Federal Register* notice. After the notice is signed, it is forwarded to the Rules and Directives Branch, Office of Administration (ADM/DAS/RDB), for transmittal to the Office of the Federal Register for publication. (2)

Distribution (F)

The administrative staff of the assigned office reviews the 10 CFR 2.206 package before it is dispatched and determines appropriate distribution. The administrative staff also performs the following actions on the day the director's decision is issued: (1)

- Telephones the Rulemakings and Adjudications Staff, SECY, to advise the staff that the director's decision has been issued. (a)
- Immediately hand-carries the listed material to the following offices (in the case of the petitioner, promptly dispatch the copies.): (b)

Distribution (F) (continued)

- Rulemakings and Adjudications Staff, SECY (i)
  - Five copies of the director's decision (*a*)
  - Two courtesy copies of the entire decision package including the distribution and service lists. Ensure that documents referenced in the decision are publicly available in the NRC Public Document Room (*b*)
  - Two copies of the incoming petition and any supplement(s) (*c*)
- Petitioner (ii)
  - Signed original letter (*a*)
  - Signed director's decision (*b*)
  - A copy of the *Federal Register* notice (*c*)
- Chief, Rules and Directives Branch (iii)
  - Original signed *Federal Register* notice (*a*)
  - Five paper copies of the notice (*b*)

Promptly fulfill these requirements because the Commission has 25 calendar days from the date of the decision to determine whether or not the director's decision should be reviewed. (2)

Although 2.206 actions are controlled as green tickets, use the following guidelines when distributing copies internally and externally: (3)

- Attach the original 2.206 petition and any enclosure(s) to the Docket or Central File copy of the first response (acknowledgment letter). Issue copies to the appropriate licensees and individuals on the docket service list(s). (a)
- When action on a 2.206 petition is completed, the petition manager should ensure that all publicly releasable documentation is placed in the PDR and the agency document control system. (b)
- The distribution list should include appropriate individuals and offices as determined by the assigned office. (c)

Followup Actions (G)

The administrative staff of the assigned office completes the following actions within 2 working days of issuance of the director's decision:

- Provide one paper copy of the director's decision to the OGC special counsel assigned to 2.206 matters. (1)
- Copy the final version of the director's decision onto a diskette in WordPerfect. Send this diskette and two paper copies of the signed director's decision to the NRC Issuances (NRCI) Project Officer, Electronic Publishing Section (EPS), Publishing Services Branch (PSB), Office of the Chief Information Officer (OCIO). (2)
- When writing opinions, footnotes, or partial information (such as errata) on the diskette, identify the opinion, the director's decision number, and the month of issuance at the beginning of the diskette. Clearly identified information on the diskettes will help to avoid administrative delays and improve the technical production schedule for proofreading, editing, and composing the documents. (3)
- Electronically mail a signed, dated, and numbered copy of the director's decision to NRCWEB for the NRC Home Page. (4)
- Electronically prepare a headnote, which is a summary of the petition consisting of no more than two paragraphs describing what the petition requested and how the director's decision resolved or closed out the petition. Electronically send the headnote to the PSB, OCIO, for monthly publication in the NRC Issuances, NUREG-0750. The headnotes should reach PSB before the 5th day of the month following the issuance of the director's decision. (5)

Commission Actions (H)

SECY informs the Commission of the availability of the director's decision. The Commission, at its discretion, may determine to review the director's decision within 25 days of the date of the decision and may direct the staff to take some other action than that in the director's decision. If the Commission does not act on the director's decision within 25 days, the director's decision becomes the final agency action and a SECY letter is sent to the petitioner informing the petitioner that the Commission has taken no further action on the petition.

Exhibit 1

Sample Acknowledgment Letter

[Petitioner's Name]
[Petitioner's Address]

Dear Mr. :

Your petition dated **[insert date]** and addressed to the **[insert addressee]** has been referred to me pursuant to 10 CFR 2.206 of the Commission's regulations. You request **[state petitioner's requests]**. As the basis for your request, you state that **[insert basis for request]**. I would like to express my sincere appreciation for your effort in bringing these matters to my attention.

Your request to **[insert request for immediate action]** at **[insert facility name]** is **[granted or denied]** because **[staff to provide explanation]**.

As provided by Section 2.206, we will take action on your request within a reasonable time. I have assigned **[first and last name of petition manager]** to be the petition manager for your petition. Mr. **[last name of petition manager]** can be reached at **[301–415–extension of petition manager]** Your petition is being reviewed by **[organizational units]** within the Office of **[name of appropriate Office]. If necessary, add:** I have referred to the NRC Office of the Inspector General (OIG) those allegations of NRC wrongdoing contained in your petition. I have enclosed for your information a copy of the notice that is being filed with the Office of the *Federal Register* for publication. I have also enclosed for your information a copy of Management Directive 8.11 on the public petition process.

Sincerely,

[Office Director]

Enclosures: *Federal Register* Notice
Management Directive 8.11 re: Petition Process

cc: **[Licensee (w/copy of incoming 2.206 request) & Service List]**

Exhibit 2

[7590–01–P]

Sample *Federal Register* Notice

U.S. NUCLEAR REGULATORY COMMISSION

Docket No(s).

License No(s).

[Name of Licensee]

RECEIPT OF REQUEST FOR ACTION UNDER 10 CFR 2.206

Notice is hereby given that by petition dated **[insert date]**, **[insert petitioner's name]** (petitioner) has requested that the NRC take action with regard to **[insert facility or licensee name]**. The petitioner requests **[state petitioner's requests]**.

As the basis for this request, the petitioner states that **[state petitioner's basis for request]**.

The request is being treated pursuant to 10 CFR 2.206 of the Commission's regulations. The request has been referred to the Director of the Office of **[insert action office]**. As provided by Section 2.206, appropriate action will be taken on this petition within a reasonable time. **[If necessary, add]** By letter dated _____, the Director **(granted or denied)** petitioner's request for **[insert request for immediate action]** at **[insert facility/licensee name]**. A copy of the petition is available for inspection at the Commission's Public Document Room at 2120 L Street, NW. (Lower Level), Washington, DC 20555-0001.

FOR THE NUCLEAR REGULATORY COMMISSION

[Office Director]

Dated at Rockville, Maryland

This _____ day of _____, 1999.

Exhibit 3

Sample One Step Acknowledgment / Denial Letter

[Insert petitioner's name & address]

Dear **[insert petitioner's name]**:

In a letter dated **[insert date]**, to **[OEDO/or addressee, NRC]**, signed by you and submitted pursuant to 10 CFR 2.206, you requested that the NRC order the **[insert facility or licensee name]** to be immediately shut down and remain shut down until either (1) all of the failed fuel assemblies are removed from the reactor core, or (2) the plant's design and licensing bases are properly updated to reflect continued operation with failed fuel assemblies. Attached to the petition was a copy of a report dated April 2, 1998, titled "Potential Nuclear Safety Hazard – Reactor Operation With Failed Fuel Cladding."

The attached report, asserts that existing design and licensing requirements for nuclear power plants preclude their operation with known fuel cladding leakage. The report recommends that the NRC take steps to prohibit nuclear power plants from operating with fuel cladding damage and specifically recommends that plants be shut down when fuel leakage is detected. The report also recommends that safety evaluations be included in plant licensing bases that consider the effects of operating with leaking fuel to justify operation under such circumstances.

Your petition stated that, because **[insert facility or licensee name]** was operating with known fuel damage, it is possible that significantly more radioactive material would be released to the reactor coolant system during a transient or accident than during steady-state operation; therefore, the design-basis accident analysis does not bound operation with known fuel cladding failures. In addition, the petition stated that the licensee appeared to be violating its licensing basis for worker radiation protection under the as low as is reasonably achievable (ALARA) program because industry experience has demonstrated that reactor operation with failed fuel cladding increases radiation exposure for plant workers.

The NRC has been observing the licensee's response to this issue since the licensee first received indication on March 25, 1999, of a potential leaking fuel rod on Unit 1. The licensee reviewed radiochemistry data that indicated the integrity of the fuel cladding had been compromised. Subsequent analysis revealed an increase in the dose-equivalent iodine that remained significantly below the limit allowed by technical specifications. After locating the leaking fuel assembly, the licensee suppressed the flux around the bundle by fully inserting three adjacent control rods. The staff finds the licensee's actions timely and appropriate.

Exhibit 3 (continued)

As you noted in your petition, you have previously submitted petitions on the **[insert facility or licensee name]** nuclear plant(s) after learning that these plants were operating with known fuel leakage. These petitions also based the requested actions on your report of April 2, 1998. The NRC responded to these petitions by a director's decision dated April 18, 1999, which is provided as an enclosure to this letter. In its decision, the staff presented its evaluation of the report which addressed the generic safety concerns for plants operating with known fuel cladding leakage. The staff concluded that operation with a limited amount of leaking fuel is within a plant's licensing basis and, in itself, does not violate ALARA-related regulations. We have compared the staff's evaluation in that director's decision against the plant-specific situation at **[insert facility or licensee name]** and have determined that the generic conclusions are applicable.

We have reviewed your letter of April 5, 1999, and find that the issues raised in the petition have been addressed in the director's decision dated April 18, 1999. The petition does not raise any significant new information about safety issues which were adequately addressed in the director's decision issued before and, therefore, does not meet the criteria for consideration under 10 CFR 2.206.

Thank you for bringing these issues to the NRC. I trust that this letter and the enclosed director's decision are responsive to your concerns.

Sincerely,

[Insert Division Director's Name]
[Office of [insert Division's Name]

Docket Nos. [50-, 50-]

Enclosure: Director's Decision 99-08

cc w/encl: See next page

Exhibit 4

[7590–01–P]

Sample *Federal Register* Notice for Director's Decision

U.S. NUCLEAR REGULATORY COMMISSION

Docket No(s).

License No(s).

[Name of Licensee]

NOTICE OF ISSUANCE OF DIRECTOR'S DECISION UNDER 10 CFR 2.206

Notice is hereby given that the Director, **[name of office]**, has issued a director's decision with regard to a petition dated **[insert date]**, filed by **[insert petitioner's name]**, hereinafter referred to as the "petitioner." The petition concerns the operation of the **[insert facility or licensee name]**.

The petition requested that **[insert facility or licensee name]** should be **[insert request for enforcement action]**. **[If necessary, add]** The petitioner also requested that a public hearing be held to discuss this matter in the Washington, DC, area.

As the basis for the **[insert date]** request, the petitioner raised concerns stemming from **[insert petitioner's supporting basis for the request]**. The **[insert petitioner's name]** considers such operation to be potentially unsafe and to be in violation of Federal regulations. In the petition, a number of references to **[insert references]** were cited that the petitioner believes prohibit operation of the facility with **[insert the cause for the requested enforcement action]**.

The petition of **[insert date]** raises concerns originating from **[insert summary information on more bases/rationale/discussion and supporting facts used in the disposition of the petition and the development of the director's decision]**.

Exhibit 4 (continued)

On **[insert date]**, the NRC conducted a meeting regarding **[insert facility or licensee name]**. The meeting gave the petitioner, the licensee, and the public an opportunity to provide additional information and to clarify issues raised in the petition.

The Director of the Office of **[name of office]** has determined that the request(s), to require **[insert facility or licensee name]** to be **[insert request for enforcement action]**, be **[granted/denied]**. The reasons for this decision are explained in the director's decision pursuant to 10 CFR 2.206 **[Insert DD No.]**, the complete text of which is available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW. (Lower Level), Washington, DC 20555-0001, and at the local public document rooms located at the **[insert the local public document room information for the licensee]**. The director's decision is available via the NRC Home Page on the World Wide Web at the following address: *http://www.nrc.gov/NRC/PUBLIC/2206/index.html.*

A copy of the director's decision will be filed with the Secretary of the Commission for the Commission's review in accordance with 10 CFR 2.206 of the Commission's regulations. As provided for by this regulation, the director's decision will constitute the final action of the Commission 25 days after the date of the decision, unless the Commission, on its own motion, institutes a review of the director's decision in that time.

Dated at Rockville, Maryland, this **[insert date]** day of **[insert month, year]**.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By

[Insert Office Director's Name]
Office of **[insert Office Name]**

OFFICIAL TRANSCRIPT OF PROCEEDINGS

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Title: CONFERENCE CALL ON 2.206 PETITION

Case No.:

Work Order No.: ASB-300-1192

LOCATION: Unknown

DATE: Unknown

PAGES: 1 - 37

ANN RILEY & ASSOCIATES, LTD.
1025 Connecticut Avenue, NW, Suite 1014
Washington, D.C. 20036
(202) 842-0034

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

***

CONFERENCE CALL ON 2.206 PETITION

The above-entitled matter came on for conference call, pursuant to notice.

APPEARANCES:

SUZANNE BLACK, Chair

ANN RILEY & ASSOCIATES, LTD.
Court Reporters
1025 Connecticut Avenue, NW, Suite 1014
Washington, D.C. 20036
(202) 842-0034

P R O C E E D I N G S

SPEAKER: That might be a good idea.

MS. BLACK: While we are waiting for Region I, I think we might as well get started. We have waited about five minutes now.

Good morning. My name is Suzanne Black and I am the Deputy Director for the Division of Licensing and Project Management in the Office of Nuclear Reactor Regulations, and I am serving in the capacity of the Petition Review Board chairman for today's meeting.

We are conducting this PRB meeting by telephone to determine if a letter that the NRC recently received from Mr. Norman Cohen representing the group Unplug Salem Campaign, dated February 22nd, 2000, warrants consideration by the agency as a petition under 10 CFR Section 2.206.

Section 2.206 provides the primary mechanism for anyone to request an evaluation by the NRC of safety issues underlying requests for NRC to take enforcement against a licensee. The NRC must determine if there is sufficient information provided in the request to qualify as a 2.206 petition. The NRC may extend, deny or grant a request for enforcement action in whole or in part, or may take action that satisfies the safety concerns raised by the requester, even though it is not necessarily an enforcement action.

Mr. Cohen has requested that the NRC order that

Salem Units 1 and 2 be immediately shut down in order to inspect their respective steam generators by NRC inspectors and independent scientists. Salem Units 1 and 2 are located approximately 18 miles south of Wilmington, Delaware and are operated by the Public Service Electric and Gas Company.

The purpose of this meeting is to allow Mr. Cohen the opportunity to present additional information related to his February 22nd, 2000 letter. The Review Board will subsequently use the information to determine whether the request meets the threshold established to be considered as a formal petition described in Section 2.206. The NRC will use this as an opportunity to listen to Mr. Cohen and others that he specifically designates in order to fully understand the information he or his organization may have concerning issues raised in his February 22nd letter.

However, as I did inform Mr. Cohen last Thursday by telephone, this is not a hearing or a meeting to discuss the merits of his request, and I thought there may be some confusion on that based on an e-mail that we were sent a copy of saying that NRC had granted a hearing. This is only to get some background information to enable us to make a decision of whether to treat this as a 2.206. So there won't be any discussion of the merits of the case today.

But before we proceed with the introduction of meeting participants, I understand there may be interested

members of the public who have taken an opportunity to dial into the Operations Center conference line in order to listen in on the public portion of this meeting. NRC meetings are open for interested members of the public to attend as observers, but we would stress to the members of the public, other than those one or two representatives who are designated to speak on behalf of Unplug Salem Campaign, may listen in as observers only.

This meeting is being transcribed, so it is necessary for those speaking to identify themselves. A transcript will be provided to the petitioner, and a copy will be placed in the public document room in about a week.

We anticipate making a decision on whether this is a 2.206 petition within a week. The petitioner will be notified shortly thereafter, probably about within a week of that decision. If it is determined to qualify as 2.206 petition, we will hear the procedures established to complete our review and make a final determination in about four months. That is the -- our management directive 811 gives us up to our months, it depends on the complexity of the issues, and we strive to give the decision as quickly as we can.

First, I would like to introduce the NRC petition board members and other NRC staff. I will ask people to go around the room and give their name and identify whether

they are a member of the board or just another member of the NRC staff.

MR. FRETTS: Bob Fretts, project manager for Salem Units 1 and 2, a member NRC staff.

MR. ANDERSON: Rick Anderson, project manager, Hope Creek, member of the NRC staff.

MR. CLIFFORD: Jim Clifford, section chief for plants that include Salem, Petition Review Board member.

SPEAKER: Eleanor [inaudible], project director for plants that include Salem, and also Petition Review Board member. And I want to introduce Mr. Fretts who will be taking over as the petition manager for this petition should it become one. Mr. Gleaves, who has done a fine job for us, is being assigned to another facility.

MR. MURPHY: Emmet Murphy, NRC staff, with the materials and [inaudible] branch.

MS. HADEN: Beth Haden on the public affairs staff.

MR. MILANO: Pat Milano, a member of the NRC staff, part of the materials and chemical engineering branch.

SPEAKER: [Inaudible] agency coordinator for 2.206 petition.

MR. BENNER: Eric Benner, NRC staff, member of the event assessment and generic communication branch.

MR. BURKOW: Kurt Burkow, project director, NRR and a member of the PRB.

MR. REEVES: Bill Reeves, St. Lucie project manager, NRC staff.

MS. BLACK: Okay. That is the staff here in headquarters. Could Region I identify themselves?

MR. MEYER: Yes, this Glenn Meyer. I am the projects branch chief in our King of Prussia office. I have with me --

MR. SHEEHAN: Neil Sheehan, public affairs office.

MS. BLACK: Okay. That's all? And Mr. Cohen, could you identify yourself and any designated representative you would like to speak on behalf of your organization?

MR. COHEN: Sure. This is Norm Cohen, I am the coordinator for the Unplug Salem Campaign, and also speaking in our behalf will be Marv Lewis, Bernard August and Jim Riccio.

MS. BLACK: Okay.

MR. COHEN: Do you want me to be go ahead?

MS. BLACK: Yes, please, go ahead.

MR. COHEN: What I was going to do is make like a general introductory statement and then ask Marv to speak because he has some time constraints.

MS. BLACK: Okay. Could I interrupt for just a

moment. I neglected to ask if the licensee was participating as an observer.

MR. CLANCY: Yes, the licensee -- this is Jim Clancy and Jeff Keenan of PSE&G. We are participating as observers.

MS. BLACK: Okay. Thank you.

I'm sorry. Go ahead, Mr. Cohen.

MR. COHEN: Okay. I wrote this letter to the NRC back in February after the Indian Point accident, asking that the two steam generators at Salem, Salem 1 and Salem 2, be inspected immediately, that the plant be shut down while they are inspected and that there be an independent observer at that inspection.

We have two different concerns, depending on which unit. Salem Unit 2 has a Westinghouse Model 51 and has the same alloy tubing as Indian Point. And so it just seems to me from just a logical standpoint that if we have a problem at one steam generator that produces a radiation leak and we still don't know the total seriousness of it, that you would want to go and inspect other steam generators that are exactly the same to reassure the public of their safety.

Salem has a long history of problems with steam generators. You have got them taking water from the Delaware Bay that is brackish and contains additional chemicals. And I know that PSE&G says that the model --

Unit 2 steam generator was inspected during the '95 to '97 outage and that everything is fine, but we do not have that much confidence in either PSE&G or the NRC, certainly based upon what happened at Indian Point.

Now, we have a source that used to work at PSE&G Salem whose job was water chemistry and steam generators who will not speak directly to you without a subpoena, who has told us that he had recommended additional steps for water chemistry to more purify the water to rust and corrosion, and that these recommendations were rejected, as well as his recommendations on a different alloy for the replacement steam generator model.

So, when I look those concerns, they just seem to be the obvious thing to do right now, and so on Salem 2, to shut it down, get a team in there and tell us what is happening.

On Salem Unit 1, it is a little different story, that was retrofitted in 1996 with a Westinghouse Model F taken from Seabrook. PSE&G claims that that means everything is fine because they are saying it is a different alloy used there. It is our understanding it the same [inaudible] 600 in Salem 1 except that it perhaps it was heat treated. And we feel that that one should be inspected to give us a gauge as to what is happening on the early ongoing, that is about two or three years worth of use and

it should be in very good condition. And if that is already showing wear, then we have another warning sign.

Once again, it is the lack of public confidence in the NRC following Indian Point and following other decisions in the case of steam generators, and the ongoing lack of public confidence in PSE&G and their history of mismanagement and safety violations at Salem that make us ask for this request that these steam generators be inspected now.

As I said in the letter and the press release, if Salem 1 and 2 were airplanes and this kind of accident happened to another airplane, the DOT would ground the whole fleet and inspect them right away. And so we feel it is just -- it is like a no-brainer, I don't even know why you need to hold the meeting. You should be inspecting them right now or making an arrangement to inspect them in the near future.

What I thought I would do is have our expert speak and them I would sum up. Marv Lewis wanted to go first because he is under some time constraints, so I would ask him to give his testimony now, if that if okay.

MS. BLACK: Okay. Thank you.

MR. COHEN: Okay.

MR. LEWIS: Thank you. This is Marvin Lewis. I am a registered professional graduate engineer in

Pennsylvania. My undergraduate degree is in metallurgical engineering and my graduate work is in chemistry. I was also -- and you will pardon me for giving the whole CV here, I was also the pro se intervenor, that means I was without a lawyer, at Three Mile Island Number 1 restart hearings. The Lewis contention was accepted. Subsequent to the acceptance by the Lewis contention, not only was the radioactive waste gas manifold, at Three Mile Island Number 1 we [inaudible] before restart, it was the contention, but also at their own idea, the NRC went about the country checking radioactive waste gas manifolds, but I don't know if they got the leaking ones fixed.

Subsequent to my intervention at Three Mile Island Number 1, the rules for intervention, namely 2.206 were tightened to make intervention more difficult and these very steps which we are going through right now were added to make sure that no individual pro se intervenors ever won another contention.

MS. BLACK: Excuse me, I would just like to cut in here. Our lawyer hasn't joined us yet, but I wanted to clarify a misconception that a lot of the public seems to have about what the 2.206 process is and whether this is a hearing. It is not a hearing, and, unfortunately, some words in the rule, when they talk about instituting a proceeding, lead people to believe that is what the 2.206

process is, but it is -- that proceeding would only be instituted when we issue an order to a licensee. The licensee could ask for a hearing on that order, but the 2.206 process itself is not a formal public hearing type of process. It is not an adjudicatory process.

MR. LEWIS: Those are interesting words which I honestly admit I don't fully understand. Thank you.

MS. BLACK: [Inaudible.]

MR. LEWIS: All right, now, to go on. First of all, we are talking about some of these alloys, namely [inaudible] 600 and I have to apologize, I am talking generically on [inaudible], and [inaudible] 600 because last night I went over, I went on the Internet and tried to download from the ASTM web site, and they rejected my credit card, so I have to talk generically because I don't have the ASTM 166 specification in front of me.

One of the things that has come up and Mr. Cohen already mentioned is the heat treatment. I have been trying to get ahold of the heat treatments on some of these -- not the heat treatments, but the heat treatment history certification. In other words, it is like a quality control package that goes along with each heating lot of material to make sure it has been heat treated correctly, and, of course, I have been unable to do that despite my contacts within the agency.

The water, of course, we have not gotten any paper work on, but mainly the water chemistry, namely, the all volatile anti-corrosion stuff.

Now, the big question in my mind is, of course, clogging and repairs of the steam generator tubing. Namely, again, I have not gotten the percentage, I have not gotten when it was done. I have not gotten the leakage rate. Now, leakage rates are supposed to be taken, but in the Three Mile Island Number 1, we start here -- pardon me, Three Mile Island Number 2 accident hearings, a man named Hartman who was a technician doing it came forward and explained how leakage rates could be maneuvered, let's say, namely, they bubble hydrogen through the tank to give us -- to give lower leakage rates than it should have been.

The other thing I am very worried about, as an individual, a ratepayer, is the fact that there is a lot of competition coming up, a lot of technical abilities coming up where the industry may find itself not needing as much as 20 percent of the power plants it presently has. Seeing as there is some feeling against nuclear power plants, I am afraid that they are the ones who will go off, that will be put down when [inaudible] are used to reduce the number, the amount of reserve that is necessary to power a grid.

Now, also, there are many, many other issues in this. It is not just one technical issue, there are many

technical issues here. There are many technical issues just with the steam generator. The problem is getting some of this information out. The problem in getting this information out is the FOIA, the Freedom of Information Act, procedure is close to useless and most of the material is a matter of the licensee or the NRC can just refuse, unless, of course, there is a hearing, to give that information out. So, I would say that is generally my statement and I thank for allowing me to give it.

MR. COHEN: Jim.

MR. RICCIO: Good morning, this is Jim Riccio from Public Citizen. Just a couple of things. You have to understand the basis for these folks' concern. NRC put forward a safety analysis at Indian Point, said everything was hunky-dory and that the plant could operate with the deteriorated steam generator tubes for another cycle without inspection, and it turned out they were wrong.

And, basically, I think what we are looking at this point is, you know, in the absence of, you know, any showing on the part of the agency that their analysis can be trusted, yeah, I think the people of Southern New Jersey and Delaware have a point that, you know, just because the NRC has said that the reactor is safe doesn't give them basically, you know, a large level of confidence at this point, because it made the same acknowledgement that Indian

Point could operate safely for a cycle and that turned out not to be the case.

There has been an extreme lack of information available to the public. After spending several hours on ADAMS to no avail, I have hustled my butt down to the public document room and pulled the one page I could find, dated May 12th, 1999, which basically says you guys did an inspection, or that actually PSE&G did an inspection of the Unit 2 during the 10th refueling outage. Unfortunately, there was very little else in the docket. I actually had the help as well of the librarian who is down there, who are generally very good, and will find documentation, and they weren't able to come up with anything.

I was able to pull, I guess, the one page that has the number of tubes that have been plugged but that is about it. I am familiar with the inspection that was done at Indian Point back in '97 and there seems to be a marked disparity between what is available in the Indian Point 2 docket as to what is available in the PSE&G docket.

The public might have a little bit more confidence in what the NRC is up to if there is more than just a one page synopsis of the number of tubes that have been plugged.

I think, too, that, you know, there was a previous 2.206 petition that was filed on Indian Point several years ago, and I look at that and see how NRC concluded everything

was fine. And, again, I think you have to understand that the folks from Southern Jersey and Delaware are concerned because, basically, NRC was making the same claims up at Indian Point. And from my understanding, you are using the older, using an older pair of steam generators in Unit 2.

My understanding, too, is that, you know, even though Indian Point has been claiming it is the water chemistry, it is the water chemistry, the problem is that you have got basically steam generator tubes that aren't really up to the job that they have been designed for. I think the voluminous lawsuits against Westinghouse basically acknowledge that there was a problem with their steam generators, and the fact that you can have ruptures and leaks in these steam gens with as little as two to five years kind of reinforces the public's desire to have a more thorough, or actually an additionally thorough inspection done of the Salem steam generators.

SPEAKER: [Inaudible.]

MR. COHEN: Bernie.

MR. AUGUST: Bernard August, I am with the Committee Against Plutonium Economics in Newark, Delaware. I am also representing Nuclear Affairs for Green Delaware.

MS. BLACK: It is very difficult to hear you. Can you speak up a little bit?

MR. AUGUST: My name is Bernard August. I am the

chairman of the Committee Against Plutonium Economics in Newark, Delaware. I am also a chair of the Nuclear Affairs for Green Delaware.

I concur with most of what everybody said without going into redundancy. The stipulations that were mentioned by Mr. Lewis and Mr. Riccio about the competency of the NRC and the PSE&G and their current operation of the plant is really -- is really something to be desired -- or undesired.

The last incident that happened had to be on the same time that the Indian Point one happened. It is just like, to me, a pretty significant sign that the same problems that have been occurring with the steam generators for the last, you know, how many years they have been operating make them inadequate, and that when they reduced all the Seabrook one, whatever the number is, I forget the ones that it was, that was a fair warning to the local people here in the community that they were not really serious about taking care of it and putting the proper equipment in, and that the current usage of this old, you know, one that had never been used, but still an old design as way to cost-cut and keep the plant running is, you know, not really -- it is an intentional safety violation as far as I can see.

SPEAKER: Right.

MR. AUGUST: And that the NRC supports this type

of, you know, rebuilding of the plants and what their concurrence is with their regulations and how they are applying them is, you know, still the same old, same old, even with the new paper reduction work act and all that, if I am making enough sense. There needs to be more concurrent information, more in-depth information, and it needs to be on the web where you can access it, and it is not being done.

And then we have to trust the utility to give us the information to begin with, you know, under a new regulatory scheme which is not working. And the GAO had specifically stated in the report that just came out not too long ago about the local inspectors fear that the new program won't even work and that they are, you know, that they are upset with it.

So I am just [inaudible] premises at all, but presented just by other federal agencies over this. You know, the plants that have this particular steam generator, especially at the Salem plant, have an extremely long history of mismanagement by PSE&G, to look at this problem, and get the information and get it corrected.

Now, as for the 2.206 regulation, I know this is not a hearing and all that, and you are going to [inaudible] determination, and it is going to take four months. You know, what will happen in four months if they have another

accident over there? And it can continue on while you are looking.

I mean this is just like, you know, it doesn't make any sense when you are blowing out radiation and, you know, and, you know, putting people in harm's way. I mean if you are downwind every time there is a radiation release there are so many nobel gases that came out, they affect the environment and the people, the food chain and the like.

So the whole thing is, it is a continued vicious cycle of deception as far as I am concerned by the utility -- not by -- yeah, possibly by the NRC, too. I mean they are trying to put a new face on themselves, but I am sorry, I have to be a bit cynical about them since I have been dealing with them for 20 some years.

So, you know, that is all I have to say about it. I mean, you know, I think the plant should be shut down. They should be properly inspected. If the steam generators are leaking, I mean they are contaminating the whole system that they are leaking radiation into the primary, into the secondary cooling system. How are they treating the water/ Where is it going if they have to release, are they going to put it in the river? I mean this whole thing, it is a disaster. And first, [inaudible] the Salem plant doesn't have a closed cooling system, they are taking water from the Delaware River, you know, and that is, you know, this in

itself is an issue.

So like Mr. Lewis stated, all you do, there will be a thousand issues as to why the plant should not be running. You know, but this is a pretty major issue since a loss of coolant accident could mean the loss of my home, you know, and, you know, the evacuation planning. You know, I am looking at this, you know, it is just crazy, and I don't think you guys have a right to put the public in harm's way over that utility over there, because of their technological and engineering inefficiencies, and then leave the place running at all -- low cost or whatever it is that they are trying to do, to produce electricity, uncompetitive electricity at that. So that is all I have to say on it.

MR. COHEN: All right. This is Norm again. We have a couple of additional issues here. Salem 2 on 2/14, event number 36696, had unidentified leakage of 1.1 gallons per minute.

MS. BLACK: This is Susan.

MR. COHEN: So there is a recent radioactive leakage. Excuse me.

MS. BLACK: I think, I think [inaudible] story, but let me just check with our news director.

MR. COHEN: Excuse me.

SPEAKER: No, I think we are just getting some other feedback.

MS. BLACK: Could you repeat that about Salem 2 on 2/14 an event of 1.1 gallons per minute.

MR. COHEN: They dumped it on February 14th.

SPEAKER: I am back now.

MS. BLACK: 2/14?

MR. COHEN: Event number 36696 had an unidentified leakage of 1.1 gallons per minute from Unit 2. This was an unidentified RCS leakage, so there is a recent event in which radioactive water has leaked into the same generator as the one that we are mainly concerned about.

Now, Jim, it didn't mention from that report that the PSE&G is claiming they have plugged about 6 percent of the tubes, is that right, Jim?

MR. RICCIO: Yeah, from the one-pager I have got, they said they have plugged 753 tubes, which constitutes 5.6 percent.

MR. LEWIS: This is Marvin Lewis, may I speak?

MR. COHEN: Yeah.

MR. LEWIS: First of all, certain -- it depends on the reactor what the unidentified leakage rate may be before it has to be shut down. Depending on the reactor, that might shut down some reactors, some of them, of course, would not. The 6 percent, I don't have the ASTM standard for pressure vessels in front of me, so I can't tell whether 6 percent plugging is -- would shut down a steam generator

of that size or not.

Also, I don't have the specifications in front of me. Then I have a dearth of specifications in front of me, but anyway depending on the steam generator and the specifications and the limits allowed within its FSAR and whatever, six percent might be a question to allow a reactor to operate with six percent plugging in the steam generators but I don't have the specifications in front of me. I think if we ever get into a hearing that is one of the big questions to ask. Thank you.

MR. RICCIO: If I could follow up on Marvin's comments, the fact that apparently you have some of the damage that has been done to your steam gens was done by possible loose parts, you obviously have like other types of corrosion and erosion corrosion working inside there, but the possibility that you have got loose parts flanking around your steam gens could basically, you know, exacerbate the wear on those generator tubes within a short period of time.

MS. BLACK: This is Susie Black. Could I remind you that this is being transcribed. We need to have speakers identified.

MR. RICCIO: Sorry, that was James Riccio, and I am pulling this, the few pages I could pull, from the document room. Basically you have a list. You have

everything from Modi SCC to stress corrosion cracking to all sorts of fun stuff that are affecting your steam generators.

The one that caught my eye was the fact that you have got possible loose parts damage, which means there is stuff inside there clanking around inside the tubes and that could actually wear the tubes out more rapidly than all the other types of degradation identified in your reports, so again just something else that might bolster the need for further examination of the steam generators.

MR. LEWIS: This is Marvin Lewis, and I am -- I know I am getting into it too much, but we don't just go with loose parts, even alloys that are questionable, clanking around there can cause various galvanic corrosion occurrence. The water chemistry is a big part of it. Even if you have a high silica content in water sometimes the erosion gets out of hand in elbows and bends and what it is, there is, like I said again, there are a thousand issues.

When you see a steam generator leaking, it is just not leaking. There's a reason, and this is one of my problems. When I looked at the root cause, primacals or whatever you want to call it, the steam generator leakage, those root cause studies raise more questions than they answer.

Thank you again.

MR. COHEN: Hello. This is Norm Cohen. I think

our discussion so far shows two issues.

One is the Catch-22 nature of this whole hearing or whatever you want to call this in which you are asking us to provide you with evidence to proceed with the 2.206 decision with the NRC and PSE&G control most of the evidence. So I would suggest, this is an informal suggestion, that one thing the NRC and PSE&G can do would be to release as much information as they have, all of their water chemistry studies, exactly how many tubes themselves, what method they used to plug the tubes.

In the Atlanta Free Press article Mr. Sidoni of PSE&G said he didn't know how many tubes are plugged and in order to reassure the public let's get all that information out on the table. It really should not be the job of a watchdog group that does not have access to some of this information. This should be one of the roles of the NRC and PSE&G.

The second point is as far as our petition is concerned, even without our having all this information which only you have, there is enough doubt, concern from our experts and ordinary people that it just seems to be a reasonable, logical idea that at least on Salem 2, which is the one that has the ancient steam generator that is leaking and plugged, that you have an independent study be done.

We are kind of flexible as far as how and when

that is. As long as it is in the near future, so that the public can be assured that Salem 1 is not going to have a major accident that will release even more radiation into the atmosphere, into the water --

SPEAKER: Could we get an answer from someone on Staff, when is the next scheduled steam generator tube inspection?

SPEAKER: Unit 2 has an outage this Fall, in October of 2000.

SPEAKER: Okay.

SPEAKER: So my feeling is that the NRC is not going to approve any of these requests. This is all public relations. Our main aim here is to reassure the public and ourselves that at least on this section of Salem the steam generators on which there's such a history of problems, that they are safe.

I think something can be worked out, and if it means October to -- we'll be rolling the dice for seven months, then maybe we can do something whether or not this is approved to get these checked out.

I understand there's different ways of looking at steam generator tubes, different methods, and there is a more advanced method than going to the ball and coil, is that what they call that?

SPEAKER: The bobbin coil is --

SPEAKER: The bobbin coil.

SPEAKER: -- is the old one.

SPEAKER: And that it is my understanding is that is SEG is using, bobbin coil, so if they are only finding six percent on bobbin coil, what if they used a newer method that looks more deeply and more carefully at the steam generators? Would that find 15 percent? I mean that is really the question.

Are we going to make a real commitment and not only here at Salem but the NRC has a moral responsibility to every other plant in this country that has the exact same Iconel 600 steam generators. They should not need the public to make them do this. They should be doing it right now on their own.

Does anybody else have some comments to make?

MR. LEWIS: Yes. Marvin Lewis again. As much as I hate to come to the defense of PSE&G every method of looking at tubing has its limitations so when you find six percent in one method, it is not the fault of the licensee that they didn't find the rest.

If the FSAR only requires that way of looking for cracks, that's the only cracks that they will see. It depends on the orientation of the crack. Even ultrasonics isn't very good when the cracks are a longitudinal rather than transverse and whatever.

So we are not saying that this is a purposeful way of getting around it, what we are saying is that it is deficient on its face not because of any wrongdoing. Thank you.

SPEAKER: Okay. Anyone else have any comments to make?

MR. AUGUST: Well, it's Bernard August again --

SPEAKER: Okay.

MR. AUGUST: I have to say that I found this, you know, a lot more informative than the information I have been finding and which I haven't been able to get any, and I appreciate Mr. Lewis and Jim Riccio for the work they did in researching this out as close as they can with the information that they have, but you know, this gets back to the point that Norman made and that we all really feel is that we don't understand why we as citizens, you know, we're here, down here in the trenches. You know, we have our families to take care of and all that and we have to do the NRC's work or make the NRC do their job, and this always has been and always will be a contention.

The new inspection program that you are trying to implement already is -- I was at a hearing on February at the Hampton Inn, Dr. Aubry Spector, but you know, this whole labelling new labelling of green, yellow and all that stuff like that -- they're giving the utilities the right to take

generic flaws that have been in the reactor since their design and put them off on some kind of proper safety level compared with something new that they may have done, and take it like it's we washed the washboard clean and we are starting from scratch and this is a pretty, I think, an insane approach to it.

MS. BLACK: This is Susie Black. I hate to interrupt but it seems to me that we are no longer focused on the Salem issue.

MR. RICCIO: I am interested in listening to what the gentleman said. It sounds very important to me.

MS. BLACK: Uh-huh.

MR. RICCIO: Go ahead. Let him continue.

MR. AUGUST: What I am trying to say, this directly is related to the Salem inspections because the generic flaws that are in the plant are being downplayed as if they're not and the NRC inspection program that you are getting ready to proceed with is kind of whitewashing all the generic troubles with most of these plants, and not just Salem but Salem especially. It was in two reports by GAO about the commiserate behavior of the NRC and the management of PSE&G.

MS. BLACK: My point was that the technical specifications that govern what kind of flaws you are allowed to operate with, they are not going to be changed by

the [inaudible] program but --

MR. AUGUST: But the enforcement method will be. That is what I am talking about. I mean you are going to let them say okay, we are going to do it this way, whatever the cheapest cost, and you won't fine them, and you will just let them get away with things and it is not an appropriate way, you know.

Some of the old SALP methods may be better. I don't know. I am still looking at this myself. I want to be at the hearing next week to talk about this some more, but as far as I can see, you know, it is kind of whitewashing the generic problems with the Salem plant.

MS. BLACK: Okay, so you want to give your comments to the NRC at that public meeting.

MR. COHEN: This is Norm. I think that we have made as good a case as we can make with the data that we have and I would hope since there seems to be a new procedure for you to have one of these meetings. I understand this is the second or the first meeting you have done in this kind of fashion?

MS. BLACK: No.

MR. COHEN: No? You have allowed people to listen in on --

MS. BLACK: They have always been open for observation.

MR. COHEN: Well, maybe nobody knew. Anyway, I hope that the NRC will think about bending over backwards so they can -- in order that the public feel confident in your organization, especially right now with this new inspection program.

MS. BLACK: Mr. Cohen, as I described last week --

MR. COHEN: Yes.

MS. BLACK: -- the purpose of this is an information gathering for us and so I don't think that the NRC has done anything for public confidence in being in a listening mode on this telephone call, and in that sense it is probably not all that good a mechanism if that is the purpose of this call would be to increase public confidence.

I think that it is --

MR. COHEN: No, the purpose of this call is to get you to inspect the Salem generators and we are operating under a disadvantage. NRC and PSE&G have the information that the public needs to find out whether or not the generators are safe, so I am saying that from that point of view whatever decision you make, you should keep that in mind.

MS. BLACK: Mr. Cohen, I would also like to point you to -- I mentioned to you last week that there was a report on the steam generator inspection, the most recent one. I have a copy of it in front of me now. The date of

it is February 28th, 2000, and it has quite a lot of detail on the results of their last steam generator inspections.

MR. COHEN: Great. Send us a copy.

MS. BLACK: It is in the public document room.

SPEAKER: It has it filed.

MS. BLACK: [Inaudible.]

MR. RICCIO: What was it in? What docket?

MS. BLACK: Oh, it's under the docket number, under Salem docket. It doesn't have an ADAMS extension number yet.

MR. RICCIO: Okay. Is this one of the documents that isn't in the new system, isn't in the old system?

MS. BLACK: It is in the old system.

MR. RICCIO: It is in the old system.

MS. BLACK: It will be in the new system too.

MR. COHEN: But may I respectfully request that we get a few of those by U.S. Mail so that we don't have to fight the computer.

MS. BLACK: Okay, Mr. Cohen, we will put a copy of this in the mail to you today.

MR. COHEN: Fine. I will make sure it gets distributed.

MR. AUGUST: Bernard August. I am on the mailing list too. I want a copy of it.

MR. COHEN: I want to thank the NRC for having

this conference call, but I hope that this is not just a pro forma discussion that we use an hour of our time, but if something comes out of this, whether it is formal or informal -- all right?

MS. BLACK: We will be making our decision and informing you in the next couple of weeks, as I said at the beginning.

Another matter, I would like to ask if there was a Representative, a Congressman LoBiondo that joined the call?

SPEAKER: Maybe not.

MS. BLACK: Maybe not, okay.

MR. RICCIO: Susie, could you just give me your phone number, because your website is down.

MS. BLACK: My phone number?

MR. RICCIO: Yes.

MS. BLACK: (301) 415-1453.

MR. RICCIO: -1453, okay.

MR. COHEN: And media people listening, I'm home for about an hour if you want to call me for comments.

SPEAKER: I need to get Suzanne Black's full name and title.

MS. BLACK: I am Suzanne -- S-u-z-a-n-n-e -- Black. I am the Deputy Director, Division of Licensing Project Management --

SPEAKER: Okay, and you are located in?

MS. BLACK: Headquarters, Rockville, Maryland.

SPEAKER: Okay, and you say you will be making a decision on a formal hearing within the next couple of weeks?

MS. BLACK: It is not a hearing. As I described in the beginning, the 2.206 process is a public process whereby members of the public can bring to the NRC issues that they believe we should take enforcement action on, and the only hearing that is offered is if we do order the licensee to take some action. The licensee has an opportunity to have a hearing on that order, but otherwise it is not a hearing.

SPEAKER: Then you will be taking action on whether or not to order an inspection.

MS. BLACK: Correct.

SPEAKER: Within about two weeks?

MS. BLACK: We will make a decision on whether to treat this as a 2.206.

SPEAKER: Okay.

MS. BLACK: And if it is treated as a 2.206, then the further step would be to [inaudible] decision which would either result in a shutdown order or some other appropriate enforcement or a denial of the petition.

SPEAKER: Okay, and that could take four months?

MS. BLACK: Four months from the date of the

letter from which we notify Mr. Cohen if it is accepted into this process or not. We make an effort to do it in as fast a timeframe as we can, based on the complexity of the issues as well as the staff resources. I don't know what else to say, sorry.

SPEAKER: That is not acceptable. Four months is not acceptable.

SPEAKER: They are going to blow us up anyway, Frank. Don't worry about it.

MS. BLACK: I'm sorry. It is not four months. If I left you with the impression that it is four months on immediate action, that is not the case. We make immediate action decisions on the safety of America, and then the written decision takes four months at the outside.

SPEAKER: Okay.

SPEAKER: I do have one question about do our State Emergency Preparedness Agencies send out information as related to like our subject we talked about today and the conference that we had so they would know that the issue is up to four, you know, with the public safety officials?

I mean would you send a transcript to Delaware, DEMA or New Jersey?

MS. BLACK: The service list gets a copy of the transcript.

SPEAKER: Okay.

SPEAKER: How large is that steam generator inspection report?

MS. BLACK: It is probably about 75 pages.

SPEAKER: Thank you.

SPEAKER: What was the date of that, Susie?

MS. BLACK: February 28th.

SPEAKER: February 28th, 2000. Right now it is not available anywhere on the --

MS. BLACK: It is available in the PDR but it is not on ADAMS yet.

MR. MULLER: This is Allen Muller, if I can interject. I would like to receive a copy of that report.

MS. BLACK: We are going to send it to Mr. Cohen and let him distribute it.

MR. COHEN: I will copy it, distribute it to everybody and then I will bill the NRC for the copying.

SPEAKER: From now on Bob Fretz will be the Project Manager for the [inaudible]. She'll be in good touch with the [inaudible]. Bob, do you have a phone number to let them have?

MR. FRETZ: Yes, sir. This is Bob Fretz and my phone number is (301) 415-1324.

SPEAKER: And how do you spell your last name?

MR. FRETZ: F-r-e-t-z.

SPEAKER: From now on the person that will report

will attend whatever conversation we had today in the realm of a transcript that takes a couple of days to get. Would you guys like to receive a copy of the transcript too?

SPEAKER: Yes.

SPEAKER: That will be part of [inaudible] and we will look at each one of your requests, item by item, and we will be guided by the stipulations given in the Management Directive 8.11.

I suppose you got a copy or do you get a hard copy of that stuff -- Management Directive 8.11.

SPEAKER: If you can provide it, it makes it easier on us.

SPEAKER: Yes, we will do that. The [inaudible] from now on what we will be looking at is -- [inaudible] whether it is going to satisfy the criteria and standard on page 8 and page 9 of that, to see whether you would qualify this as [inaudible] and we'll move them there.

SPEAKER: All right.

SPEAKER: And Bob Fretz will basically keep you updated [inaudible] and whether it is accepted and we will go from there.

SPEAKER: Okay. I appreciate your concern on this issue.

MS. BLACK: Okay, thank you.

SPEAKER: Thank you very much.

SPEAKER: Thank you.

SPEAKER: Bye-bye.

MS. BLACK: Bye.

SPEAKER: Hey, Norm, if you have any questions?

MR. COHEN: May I have your number?

SPEAKER: Sure. It's (202) 546-996 --

MR. COHEN: What is it?

SPEAKER: 546-4996.

MR. COHEN: 4996.

SPEAKER: -- get our hands on that report.

SPEAKER: Also, they are claiming it's in the document room. I was down there yesterday. I would have found it. It wasn't there.

What is going on with the NRC at this point is you are caught between two system. You have got the new ADAMS system and the old PDR-BRS system and the only thing that gets down to the document room at this point are high interest documents, high interest of course being determined of course by NRC. Obviously the steam generator tube inspection wasn't a high interest document, so at least we will get our hands on that and see whether we actually have got more to go on.

The thing is that they treat it like it should be hard for us to actually get what we need out of this because, you know, basically they are going to claim that

they have done the inspection in May of '99, they are going to do one in October, 2000.

SPEAKER: I guess you they to cut us off.

SPEAKER: That's okay, cut us off. I'll talk to you guys later.

SPEAKER: Okay. All right. I'll see you.

[Whereupon, the telephone conference was concluded.]

CERTIFICATE

This is to certify that the attached proceedings before the United States Nuclear Regulatory Commission in the matter of:

Name of Proceeding: CONFERENCE CALL ON 2.206 PETITION

Docket Number:

Place of Proceeding: Unknown

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission transcribed by me from recorded tapes provided by the Nuclear Regulatory Commission, and that the transcript is a true and accurate record of the foregoing proceedings to the best of my belief and ability.

Martha Brazil

Transcriber

Ann Riley & Associates, Ltd.