

AmerGen Energy Company, LLC  
Three Mile Island Unit 1  
Route 441 South, P.O. Box 480  
Middletown, PA 17057

Telephone: 717-944-7621

October 29, 2001  
5928-01-20312

Mr. Samuel J Collins  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852-2738

THREE MILE ISLAND, UNIT 1 (TMI UNIT 1)  
OPERATING LICENSE NO. DPR-50  
NRC DOCKET NO. 50-289

**SUBJECT:** Communications with the NRC Regarding the TMI Unit 1 Cycle 14  
Refueling (1R14) Outage Examination and Repair Of the Once-Through  
Steam Generators

TMI Unit 1 is shutdown for its Cycle 14 Refueling (T1R14) Outage with the Once-Through Steam Generators open for tests and inspections. On October 20, 2001 AmerGen provided an immediate notification to the NRC of a degraded condition with at least one tube of the "B" OTSG not having met the required structural performance criterion as determined by eddy current testing. In addition, a follow-up Licensee Event Report (LER) is required to be submitted within 60 days. The purpose of this letter is to describe our intent to keep the NRC informed of our actions related to our development of the most probable root cause of the event, the extent of condition, the steam generator repair plan, and the operational assessment prior to restart.

During a telephone conference with the NRC on October 22, 2001, which had been arranged prior to the current outage, an overview of this event was discussed. At that time our investigations into the root cause of the tube damage had just begun.

In a second telephone conference held on October 26, 2001 Exelon/AmerGen discussed our investigation of the potential failure mechanisms. We described the process we intend to use in eliminating failure mechanisms that are unlikely to have caused this damage and the analysis that is planned to determine the extent of condition. The results from laboratory analysis of tubing samples that are being removed from the steam generators will be necessary to determine the most probable failure mechanism. We also discussed the work that will be needed to develop our extent of condition review that will be used to develop repair plans. During the October 26, 2001 telephone conference, the NRC expressed a desire to be kept informed of the steam generator work during its development to provide time for review and understanding of the conclusions prior to restart of the unit.

In addition to the communications described above that have taken place to date, we intend to provide utility support of the NRC Region I inspection activities on site and

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routine daily telephone contact with the NRC Resident Inspector and the NRR Project Manager. We plan to schedule a telephone conference between AmerGen/Exelon and the NRC to discuss the preliminary results from laboratory examinations of "pulled tube" samples and our assessment of the most probable root cause. We also plan to conduct conference calls to discuss our plans to address the extent of condition and repair plans.

Preparation of an operational assessment in accordance with NEI 97-06, "Steam Generator Program Guidelines, Revision 1," is required by plant procedure. It is our intent to provide information that will be needed by the NRC to understand the basis of our conclusions regarding our operational assessment so that there is adequate time for NRC review prior to the startup following the completion of the T1R14 outage. The operation assessment is an evaluation of the steam generator tube conditions needed to predict that structural integrity and accident leakage performance will be acceptable during Cycle 14 operation.

Respectfully,



Jeffrey A. Benjamin  
Vice President, Licensing and Regulatory Affairs

cc: H. J. Miller, USNRC, Regional Administrator, Region I  
B. W. Sheron, USNRC, NRR  
J. A. Zwolinski, USNRC, NRR  
J. Strosnider, USNRC, NRR  
Elinor G. Adensam, USNRC, NRR  
R. Blough, USNRC, Region I  
W. Lanning, USNRC, Region I  
J. Rogge, USNRC, Region I  
M. C. Modes, USNRC, Region I  
T. G. Colburn, USNRC, Senior Project Manager, TMI Unit 1  
J. D. Orr, USNRC, Senior Resident Inspector, TMI Unit 1  
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