



Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

November 6, 2006

Samuel J. Collins, Regional Administrator
U.S. Nuclear Regulatory Commission Region I
475 Allendale Road
King of Prussia, PA 19406-1415
Earth

**SUBJECT: INDICATIONS OF INADEQUATE OPERATOR TRAINING AND/OR
OPERATING PROCEDURES AT THREE MILE ISLAND**

Dear Mr. Collins:

NRC Daily Event Report (DER) No. 42957 involved a reactor trip at Three Mile Island Unit 1 at 13:34 pm on November 2, 2006. The licensee's initial report to the NRC occurred at 14:53 pm that day. According to this DER, the licensee stated:

At 1334 on 11-2-06 an Automatic Reactor Trip occurred from 100% power. All systems functioned as required. One safety valve stuck open on both OTSGs [once-through steam generators]. They subsequently re-seated.

The following day at 16:07 pm, the licensee updated their initial report with this information:

Post trip evaluation determined that the Main Steam safety valves were not stuck open. The safety valves were operating within their tolerance band. The "B" OTSG Main Steam safety valve resealed with no operator action as steam pressure decreased. The "A" Main Steam safety valve was resealed when operators lowered OTSG pressure in accordance with Plant Operating Procedures.

Assuming the licensee's reports are accurate, this event very strongly suggests that operator training and/or operating procedures at Three Mile Island are alarmingly deficient. One hour and 19 minutes into the event, the licensee reported to the NRC that the steam generator safety valves were both stuck open. Yet the follow-up report relayed that these safety valves were not stuck open but were open because the pressure was above their closing setpoints. In other words, the safety valves had been open because they were designed to be open at that pressure.

One would expect that training and/or procedures would equip the operators with relevant knowledge such as the closing pressures for the steam generator safety valves and that the operators just might be able to figure out if the safety valves were supposed to be open or not – yet this event showed otherwise.

This event is not a precursor. It's a recursor. The world is all too aware about the dangers of operators manning the Three Mile Island control room with deficient training and procedures with misperceptions about proper valve positioning.

Washington Office: 1707 H Street NW Suite 600 • Washington DC 20006-3919 • 202-223-6133 • FAX: 202-223-6162
Cambridge Headquarters: Two Brattle Square • Cambridge MA 02238-9105 • 617-547-5552 • FAX: 617-864-9405
California Office: 2397 Shattuck Avenue Suite 203 • Berkeley CA 94704-1567 • 510-843-1872 • FAX: 510-843-3785

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On behalf of TMI Alert and the Union of Concerned Scientists, we urge the NRC to rigorously examine the operator training and operating procedures at Three Mile Island and determine why the operators during this event mistakenly concluded that the steam generator safety valves were "stuck open." The NRC should also ascertain the extent of the operators' ignorance of plant design (i.e., are they only unaware of safety valve operating characteristics or are they generally unaware of how equipment at the plant functions?).

Sincerely,

<ORIGINAL SIGNED BY DAVID LOCHBAUM
FOR ERIC EPSTEIN>

Eric Epstein
Executive Director
TMI Alert

A handwritten signature in black ink that reads "David O. Lochbaum". The signature is written in a cursive, flowing style.

David Lochbaum
Director, Nuclear Safety Project
Union of Concerned Scientists