

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 14, 1994

50-269, 50-270, 50-287, Docket Nos. 50-289, 50-302, 50-313 and 50-346

9406200190 940614

ADOCK 05000269

PDR

150036

GROUP: BABCOCK & WILCOX OWNERS' GROUP

SUBJECT: SUMMARY OF MEETING HELD ON MAY 27, 1994, TO DISCUSS ULTRASONIC TESTING IN LIEU OF SURFACE EXAMINATION OF REACTOR VESSEL NOZZLE WELDS

- **REFERENCES:** 1. Inspection Report 50-302/89-21 issued by the NRC on August 25, 1989
 - 2. Letter to U.S. NRC from Duke Power Company dated November 18, 1993
 - 3. Letter from U.S. NRC to Duke Power Company dated March 1, 1994
 - 4. Letter to U.S. NRC from The B&W Owners' Group dated April 13. 1994

On May 27, 1994, NRC staff members met at Rockville, Maryland, with members of the Babcock & Wilcox Owners' Group (B&WOG) at a public meeting to discuss an alternative to surface examination of reactor vessel nozzle welds. A list of people attending the meeting is provided in Enclosure 1.

The B&WOG made presentations on the demonstration history, demonstration objectives, analysis and calculations to support flaw size used in the demonstration. Slides presented at the meeting, except for those designated as proprietary, are included in Enclosure 2. The slides designated as proprietary were previously submitted under affidavit on October 13, 1993.

During the late 1980's and early 1990's, relief requests were conditionally approved in safety evaluation reports (SERs) with the provision that the licensee's demonstrate the ultrasonic examination techniques and procedures applied on the inside diameter surface to detect surface connected defects on the outside diameter in the circumferential orientation in a laboratory test block. The defects were supposed to be cracks and not machine notches. A demonstration conducted in 1989 on a core flood nozzle with machined notches

FILE CENTER

did not detect flaws in Inconel material. In 1991, other B&W plants requested that B&WOG conduct a demonstration that could be used for all B&W plants (a generic relief request). A second demonstration conducted in 1993 on core flood nozzle and reactor coolant nozzle mockups was capable of detecting cracks larger than the maximum acceptable for the surface examination method.

In a telephone conversation on November 10, 1993, the NRC stated that the demonstration was inadequate to satisfy the condition stipulated in the SERs. A licensee submittal (Reference 2) described the reasons for believing the 1993 demonstration fulfilled the conditions stipulated by the SERs and requested the NRC reconsider its position on the 1993 demonstration. The NRC reaffirmed its position and described its concerns in additional questions to the licensee, (Reference 3). The response to these additional questions was submitted (Reference 4). The subject meeting was requested to clarify what questions or concerns remained.

B&WOG stated that for the 1993 demonstration, one official set of data collected by one individual, qualified per ASME Code, was used to identify all the flaws. The procedure that was used addressed the essential variables. The procedures that would be used for plant specific examinations would contain these same essential variables, but may have administrative changes.

Although B&WOG did not have a precise minimum detection surface flaw length, they estimated that the indexing used in the 1993 demonstration would pick-up a 1/2-inch long flaw in at least 4 scans. This would be the same for both the reactor coolant and core flood systems.

In reviewing the fracture mechanics calculation for the core flood nozzle submitted in Reference 4, B&WOG identified at least one other plant with a 40 percent higher stress value.

In summary, the NRC is amenable to granting relief from performing surface examinations of reactor vessel nozzles to reduce radiation exposure to nondestructive examination personnel. The NRC understands that the demonstration held in 1993 was not to demonstrate an equivalency to a surface examination. The demonstration was a capability demonstration to show that flaws located in the test block could be detected and was not intended to be a reliability demonstration. The presentation clarified that a fracture mechanics analysis (based on minimum detectable flaw size and maximum propagation rates) plus a reliability safety factor, combined with ultrasonic testing may prove to be an acceptable alternative and meet the intent in the SER. However, the NRC would need a detailed submittal on the fracture mechanics analysis including the loadings, basis for any assumptions, and the inclusion of margins and uncertainties. The additional information needs to specify which nozzles (size, location/identification, plant) are included and state if the analyses are bounding for all plants.

At the conclusion of the meeting, the B&WOG stated they would submit additional information in four to six weeks. The NRC said this should allow sufficient time to support the first unit affected that needs the exemption by February 1995. The NRC encouraged B&WOG to work with ASME Code Committees to allow this alternative.

Original signed by

Linda L. Gundrum, Acting Project Manager Project Directorate III-3 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Enclosures:

- 1. List of Attendees
- 2. Presentation Slides (nonproprietary)

cc w/enclosures: See next page

DISTRIBUTION

see allached pa	age			
OFFICE	LA:PDIII-3	APM:PDIII-3	BC:EMCB	PD:PDILI-3
NAME	MRushtok	LGundrum	JStrosmider	JHanndn
DATE	6/9/94	6/9/94	6/ /0/94	6/3/94

OFFICIAL RECORD COPY

FILENAME: G:\B&WOG.MIN

Mr. Gene Navratil GPU Nuclear Route 441 South P.O. Box 480 Middletown, Pa 17057

Rooney Sheffield Duke Power Company McGuire Nuclear Station Hagors Ferry Road Huntersville, NC 28078

Kevin Hacker BWNT 3315 Old Forest Road Lynchburg, VA 24506

David Nix Duke Power Company Oconee Nuclear Site P. O. Box 1439 Seneca, South Carolina 29679

Frank Walters BWNT 3315 Old Forest Road Lynchburg, VA 24506

Kenneth K. Yoon BWNT 3315 Old Forest Road Lynchburg, VA 24506

J. H. Taylor BWNT 3315 Old Forest Road Lynchburg, VA 24506

D[#]STRIBUTION - Meeting Minutes

Docket Files NRC PDR PD III-3 Reading File JHannon JHopkins LGundrum MRushbrook B. Grimes A. Chaffee, OEAB OGC E. Jordan JStrosnider (7-D-4) ESullivan (7-D-4)DNaujock (7-D-4) LWiens (14-H-25) LRaghavan (14-H-15) GWest (13-E-14) GKalman (13-H-3) RHernan (14-C-12) PRush, Region II KBattige (7-D-4) ACRS (10) **OPA** NRR Mailroom, PMAS, 12/G/18 S. Black, RPEB (10-A-19) W. Dean, EDO, Region I Plants, MS 17-G-21 A. Howell, EDO, Region II Plants, MS 17-G-21 B. McCabe, EDO, Region III Plants, MS 17-G-21 J. Mitchell, EDO, Region IV Plants, MS 17-G-21 R. Cooper, Region I, DRP E. Merschoff, Region II, DRP E. Greenman, Region III, DRP A. Beach, Region IV, DRP

漤

ENCLOSURE 1

ATTENDANCE LIST

<u>NAME</u>	AFFILIATION	PHONE
Gene Navratil	GPU Nuclear	717-948-8716
Rodney Sleffield	Duke Power Co.	704-874-4467
Kevin Hacker	BWNT	804-385-3539
David Nix	Duke Power Co.	803-885-3634
Frank Walters	BWNT	804-385-2208
Kenneth Yoon	BWNT	804-385-3280
James Taylor	BWNT	804-385-2817
Ken Battige	NRC/NRR	301-504-2730
Linda Gundrum	NRC/NRR	301-504-1380
Garmon West, Jr.	NRC/NRR	301-504-3063
Ted Sullivan	NRC/NRR	301-504-3266
Phillip Rush	NRC/NRR	301-504-3743
Donald Naujock	NRC/NRR	301-504-2767
Jack Strosnider	NRC/NRR	301-504-1495
Len Wiens	NRC/NRR	301-504-1495
Boyd Brown	INEL	208-526-6048
Al Porter	INEL	208-526-6048

DEMONSTRATION HISTORY

1989 Demonstration

- Proved shear wave technique was inadequate for exams performed in 1985 for OD surface connected reflectors.
- -- Proved longitudinal wave technique is capable of detecting OD surface connected reflectors.

1993 Demonstration

- Proved the longitudinal wave technique is capable of detecting OD surface connected thermal fatigue flaws.
- -- Proved the technique used provided accurate flaw sizing information.

RELIEF REQUESTS

Individual B&WOG utilities have submitted relief requests to the NRC and have received SERs with the following compliance requirements:

OCONEE AND TMI-1

- 1. Examine entire volume of weld and heat affected zone.
- 2. Demonstrate capability to detect circumferential OD surface connected cracks, not machined notches.

CRYSTAL RIVER UNIT 3

Perform a demonstration to show the capability of the ultrasonic examination to detect and size surface flaws.

ARKANSAS NUCLEAR ONE

Demonstrate the ability to detect OD surface flaws from the ID.

ISI INTERVAL END DATES FOR RELIEF REQUESTS

Arkansas Nuclear One Unit 1February 1995Crystal River Unit 3March 1997Oconee Unit 1July 1994 ^{1, 3}Oconee Unit 2December 1994 ^{1, 3}Oconee Unit 3December 1994 ^{1, 3}TMI - 1April 2001 ²

- ¹ Examination already completed
- ² Two of ten examinations completed
- ³ Relief granted to extend subject inspection (Unit 1--10/95, Unit 2--1/96, Unit 3--5/95)

B&WOG MEETING OBJECTIVES

 Obtain NRC concurrence that we have successfully demonstrated compliance with NRC requests as stated in the individual utilities SERs.

B&WOG Conclusion & Summary

Mockup Demonstrations verify that OD flaws of interest can be detected and sized by using the demonstrated UT techniques.

FM evaluations support the conclusion that required safety margins are maintained between minimum detectable defects and maximum expected allowable flaw size for the design conditions.

Core Flood Nozzle Safend Welds













J

л₽ пь

 0.6

-



DEMONSTRATION OBJECTIVES

1989

DEMONSTRATE THE FLAW DETECTION CAPABILITIES OF THE ULTRASONIC (UT) EXAMINATION TECHNIQUES FOR INSPECTION of PLANAR REFLECTORS OPPOSITE SURFACE FLAWS.

1993

DEMONSTRATE THE FLAW DETECTION and SIZING CAPABILITIES OF THE ULTRASONIC (UT) EXAMINATION TECHNIQUES FOR INSPECTION of REAL OPPOSITE SURFACE FLAWS.

B&WOG UT MOCKUPS

CORE FLOOD NOZZLE PIPING WELDS

1989 MOCKUP

CORE FLOOD SAFE-END TO NOZZLE WELD SIMILAR (MATERIAL AND GEOMETRY) TO ALL OPERATING B&W DESIGNED PLANTS

CONTAINS FOUR SETS OF PLANAR REFLECTORS (EDM NOTCHES) DISTRIBUTED THROUGHOUT THE VARIOUS MATERIALS OF THE WELD JOINT (NOZZLE BASE MATERIAL, INCONEL BUTTERING, INCONEL WELD AND STAINLESS STEEL SAFE-END)

NOTCH SETS CONSISTED OF FOUR THROUGH-WALL SIZES: 2.3%, 5.6%, 11.3% AND 16.9%

1993 MOCKUP

CONSISTS OF A CORE FLOOD PIPE TO SAFE-END AND SAFE-END TO NOZZLE WELDS SIMILAR (MATERIAL AND GEOMETRY) TO ALL OPERATING B&W DESIGNED PLANTS

B&WOG UT MOCKUPS continued

CORE FLOOD PIPE TO SAFE-END WELD

CONTAINED FOUR O.D. SURFACE, THERMAL FATIGUE CRACKS DISTRIBUTED THROUGHOUT THE WELD AND BASE MATERIAL

CRACK SIZES RANGE FROM 11% TO 71.8% THROUGH-WALL

CORE FLOOD SAFE-END TO NOZZLE WELD

CONTAINED FOUR O.D. SURFACE, THERMAL FATIGUE CRACKS DISTRIBUTED THROUGHOUT THE VARIOUS MATERIALS OF THE WELD JOINT

CRACK SIZES RANGE FROM 12.6% TO 62.9% THROUGH-WALL

B&WOG UT MOCKUPS continued

REACTOR COOLANT NOZZLE TO PIPE WELD

1993 MOCKUP

CONSISTS OF A CLAD FERRITIC DESIGN SIMILAR TO ALL OPERATING B&W OPERATING PLANTS

CONTAINS FIVE THERMAL FATIGUE CRACKS RANGING FROM 7.6% TO 78.7% THROUGH-WALL

FLAWS DISTRIBUTED IN BOTH THE WELD AND BASE MATERIALS

٥

DEMONSTRATION RESULTS

1989

SUCCESSFUL IN DEMONSTRATING THE DETECTABILITY OF THE UT EXAMINATION TECHNIQUE FOR SMALL (LENGTH AND THROUGH-WALL) PLANAR REFLECTORS (EDM NOTCHES) LOCATED IN THE VARIOUS MATERIALS OF THE MOCKUP

DETECTED REFLECTORS AS SMALL AS 2.3% THROUGH-WALL IN ALL THE MATERIALS OF THE WELD JOINT (NOZZLE BASE MATERIAL, INCONEL BUTTERING, INCONEL WELD AND STAINLESS STEEL SAFE-END)

1993

SUCCESSFULLY DEMONSTRATED the 100% DETECTION OF ALL THERMAL FATIGUE FLAWS IMPLANTED IN BOTH MOCKUPS (CORE FLOOD AND REACTOR COOLANT)

ACCURATELY DEPTH SIZED ALL THERMAL FATIGUE FLAWS WITHIN A RMS ERROR OF 0.076 INCHES

INSERVICE INSPECTION



Ξ

2

Ŧ

FLAW EVALUATION

o FLAW TYPE -- EXTERNAL CIRC. FLAW ON A CYLINDER

- LOAD/STRESSES
 DESIGN BASIS LOADS FROM STRESS REPORT HEATUP AND COOLDOWN STRESSES
 - -- INSPECTION INTERVAL 10 YEARS 90 CYCLES/ 10 YEARS
- o MATERIAL STAINLESS STEEL da/dN from Appendix C of Section XI

2.1 Weld Geometry

1. A. S. S.

The geometry of the two weld locations is given in Reference 5. The weld geometries are cylindrical. The pertinent dimensions for each of the weld locations are given below.

- a) For the Nozzle to Safe-end Weld Outside radius of weld, $R_0 = 7.8125$ inches Inside radius of weld, $R_1 = 6.125$ inches Thickness of weld, t = 1.6875 inches
- b) For the Safe-end to Pipe Weld Outside radius of weld, $R_o = 7.125$ inches Inside radius of weld, $R_i = 5.75$ inches Thickness of weld, t = 1.375 inches







バデ

•



1. 6. 1. 25

FLAW EVALUATION OF CORE FLOOD NOZZLE WELDS

I. NOZZLE TO SAFE-END WELD

MAX. ALLOWABLE FLAW a/t = 0.45

2. SAFE-END TO PIPE WELD

MAX. ALLOWABLE FLAW a/t = 0.56

Core Flood Nozzle to Safe-End						
Flaw No.	a/l	a/t \$	IWB-3514 Max. a/t:	t (inches)		
1	.22	12.6	10.9	1.80		
2	.25	25.2	11.0	1.80		
3	.28	39.5	11.1	1.80		
4	.45	62.9	11.8	1.80		
Core Flood Safe-End to Pipe						
7	.17	22.0	11.1	1.10		
8	.25	38.6	11.5	1.10		
9	.29	71.8	11.6	1.10		
10	.16	11.0	11.1	1.10		
Reactor Coolant Outlet Nozzle to Pipe						
1 :	.25	7.6	11.7	3.0		
2	.50	78.7	13.2	3.0		
3	.27	16.3	12.3	3.0		
4	.45	37.1	13.2	3.0		
5	-28	10.9	12.6	3.0		

.

.

;;

_

and the second sec

· . .

•

•



Toledo Edison Company

cc:

1. Sec.

Mary E. O'Reilly Centerior Energy **Cor**poration 300 Madison Avenue Toledo, Ohio 43652

Mr. William T. O'Connor, Jr. Manager - Regulatory Affairs Toledo Edison Company Davis-Besse Nuclear Power Station 5501 North State - Route 2 Oak Harbor, Ohio 43449

Gerald Charnoff, Esq. Shaw, Pittman, Potts and Trowbridge 2300 N Street, N. W. Washington, D. C. 20037

Regional Administrator, Region III U. S. Nuclear Regulatory Commission 801 Warrenville Road Lisle, Illinois 60532-4351

Mr. Robert B. Borsum Babcock & Wilcox Nuclear Power Generation Division 1700 Rockville Pike, Suite 525 Rockville, Maryland 20852

Resident Inspector U. S. Nuclear Regulatory Commission 5503 N. State Route 2 Oak Harbor, Ohio 43449

Mr. John K. Wood, Plant Manager Toledo Edison Company Davis-Besse Nuclear Power Station 5501 North'State Route 2 Oak Harbor, Ohio 43449

Robert E. Owen, Chief Bureau of Radiological Health Services Ohio Department of Health Post Office Box 118 Columbus, Ohio 43266-0118 Davis-Besse Nuclear Power Station Unit No. 1

Attorney General Department of Attorney General 30 East Broad Street Columbus, Ohio 43216

Mr. James W. Harris, Director Division of Power Generation Ohio Department of Industrial Regulations P. O. Box 825 Columbus, Ohio 43216

Ohio Environmental Protection Agency DERR--Compliance Unit ATTN: Zack A. Clayton P. O. Box 1049 Columbus, Ohio 43266-0149

State of Ohio Public Utilities Commission 180 East Broad Street Columbus, Ohio 43266-0573

Mr. James R. Williams State Liaison to the NRC Adjutant General's Department Office of Emergency Management Agency 2825 West Granville Road Columbus, Ohio 43235-2712

Mr. Donald C. Shelton Vice President, Nuclear-Davis-Besse Centerior Service Company c/o Toledo Edison Company 300 Madison Avenue Toledo, Ohio 43652 Entergy Operations, Inc.

Arkansas Nuclear One, Unit 1

cc:

Mr. Harry W. Keiser, Executive Vice President & Chief Operating Officer
Entergy Operations, Inc.
P. O. Box 31995
Jackson, Mississippi 39286

Mr. Charles B. Brinkman, Manager Washington Nuclear Operations ABB Combustion Engineering Nuclear Power 12300 Twinbrook Parkway, Suite 330 Rockville, Maryland 20852

Mr. Nicholas S. Reynolds Winston & Strawn 1400 L Street, N.W. Washington, D.C. 20005-3502

Mr. Robert B. Borsum Licensing Representative B&W Nuclear Technologies 1700 Rockville Pike, Suite 525 Rockville, Maryland 20852

Senior Resident Inspector U.S. Nuclear Regulatory Commission P. O. Box 310 London, Arkansas 72847

Regional Administrator, Region IV U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Honorable C. Doug Luningham County Judge of Pope County Pope County Courthouse Russellville, Arkansas 72801

Ms. Greta Dicus, Director Division of Radiation Control and Emergency Management Arkansas Department of Health 4815 West Markham Street Little Rock, Arkansas 72205-3867 Mr. Jerrold G. Dewease Vice President, Operations Support Entergy Operations, Inc. P. O. Box 31995 Jackson, Mississippi 39286

Mr. Robert B. McGehee Wise, Carter, Child & Caraway P. O. Box 651 Jackson, Mississippi 39286

Admiral Kinnaird R. McKee, USN (Ret) 214 South Morris Street Oxford, Maryland 21654 Duke Power Company

cc: A. V. Carr, Esquire Duke Power Company 422 South Church Street Charlotte, North Carolina 28242-0001

J. Michael McGarry, III, Esquire Winston and Strawn 1400 L Street, NW. Washington, DC 20005

Mr. Robert B. Borsum Babcock & Wilcox Nuclear Power Division Suite 525 1700 Rockville Pike Rockville, Maryland 20852

Manager, LIS NUS Corporation 2650 McCormick Drive, 3rd Floor Clearwater, Florida 34619-1035

Senior Resident Inspector U. S. Nuclear Regulatory Commission Route 2, Box 610 Seneca, South Carolina 29678

Regional Administrator, Region II U. S. Nuclear Regulatory Commission 101 Marietta Street, NW. Suite 2900 Atlanta, Georgia 30323

Max Batavia, Chief Bureau of Radiological Health South Carolina Department of Health and Environmental Control 2600 Bull Street Columbia, South Carolina 29201

County Supervisor of Oconee County Walhalla, South Carolina 29621 Mr. Steve Benesole Compliance Duke Power Company Oconee Nuclear Site P. O. Box 1439 Seneca, South Carolina 29679

Oconee Nuclear Station

Mr. Marvin Sinkule, Chief Project Branch #3 U. S. Nuclear Regulatory Commission 101 Marietta Street, NW. Suite 2900 Atlanta, Georgia 30323

Ms. Karen E. Long Assistant Attorney General North Carolina Department of Justice P. O. Box 629 Raleigh, North Carolina 27602

Mr. G. A. Copp Licensing - EC050 Duke Power Company 526 South Church Street Charlotte, North Carolina 28242-0001

Mr. J. W. Hampton Vice President, Oconee Site Duke Power Company P. O. Box 1439 Seneca, South Carolina 29679

Dayne H. Brown, Director Division of Radiation Protection North Carolina Department of Environmental Health and Natural Resources P.O Box 27687 Raleigh, North Carolina 27611-7687 Florida Power Corporation

cc: Mr. Gerald A. Williams Corporate Counsel Florida Power Corporation MAC-A5A P. O. Box 14042 St. Petersburg, Florida 33733

Mr. Bruce J. Hickle, Director Nuclear Plant Operations (NA2C) Florida Power Corporation Crystal River Energy Complex 15760 W. Power Line Street Crystal River, Florida 34428-6708

Mr. Robert B. Borsum B&W Nuclear Technologies 1700 Rockville Pike, Suite 525 Rockville, Maryland 20852

Regional Administrator, Region II U. S. Nuclear Regulatory Commission 101 Marietta Street N.W., Suite 2900 Atlanta, Georgia 30323

Mr. Bill Passetti Office of Radiation Control Department of Health and Rehabilitative Services 1317 Winewood Blvd. Tallahassee, Florida 32399-0700

Attorney General Department of Legal Affairs The Capitol Tallahaseee, Florida 32304

Mr. Percy M. Beard, Jr. Sr. Vice President Nuclear Operations Florida Power Corporation ATTN: Manager, Nuclear Licensing (NA2I) Crystal River Energy Complex 15760 W Power Line Street Crystal River, Florida 34428-6708 Crystal River Unit No.3 Generating Plant

Mr. Joe Myers, Director Div. of Emergency Preparedness Department of Community Affairs 2740 Centerview Drive Tallahassee, Florida 32399-2100

Chairman Board of County Commissioners Citrus County 110 North Apopka Avenue Inverness, Florida 32650

Mr. Rolf C. Widell, Director Nuclear Operations Site Support (NA2I) Florida Power Corporation Crystal River Energy Complex 15760 W Power Line Street Crystal River, Florida 34428-6708

Senior Resident Inspector Crystal River Unit 3 U.S. Nuclear Regulatory Commission 6745 N. Tallahassee Road Crystal River, Florida 34428

Mr. Gary Boldt Vice President - Nuclear Production (SA2C) Florida Power Corporation Crystal River Energy Complex 15760 W Power Line Street Crystal River, Florida 34428-6708

Three Mile Island Nuclear Station, Unit No. 1

cc:

Michael Ross O&M Director, TMI-1 GPU Nuclear Corporation Post Office Box 480 Middletown, Pennsylvania 17057

John C. Fornicola Director, Licensing and Regulatory Affairs GPU Nuclear Corporation 100 Interpace Parkway Parsippany, New Jersey 07054

Jack S. Wetmore TMI Licensing Manager GPU Nuclear Corporation Post Office Box 480 Middletown, Pennsylvania 17057

Ernest L. Blake, Jr., Esquire Shaw, Pittman, Potts & Trowbridge 2300 N Street, NW. Washington, DC 20037

Chairman Board of County Commissioners of Dauphin County Dauphin County Courthouse Harrisburg, Pennsylvania 17120

Chairman Board of Supervisors of Londonderry Township R.D. #1, Geyers Church Road Middletown, Pennsylvania 17057 Michele G. Evans Senior Resident Inspector (TMI-1) U.S. Nuclear Regulatory Commission Post Office Box 311 Middletown, Pennsylvania 17057

Regional Administrator, Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406

Robert B. Borsum B&W Nuclear Technologies Suite 525 1700 Rockville Pike Rockville, Maryland 20852

William Dornsife, Acting Director Bureau of Radiation Protection Pennsylvania Department of Environmental Resources Post Office Box 2063 Harrisburg, Pennsylvania 17120

Mr. T. Gary Broughton, Vice President and Director - TMI-1
GPU Nuclear Corporation
Post Office Box 480
Middletown, Pennsylvania 17057