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MAR 15 1977

Docket No. 50-320

Metropolitan Edison Company
ATTN: Mr. R. C. Arnold
Vice President
P. O. Box 542
Reading, Pennsylvania 19603

Gentlemen:

SUBJECT: EQUIPMENT TO MITIGATE CONSEQUENCES OF A SECONDARY SYSTEM LINE BREAK

In various recent meetings and telephone conversations between members of your staff and ours, the design of equipment needed to mitigate the consequences of a steam line break accident on Three Mile Island, Unit 2 has been discussed. During the meeting of February 18, 1977, our position on this matter was clarified, and is summarized below.

For a spontaneous break anywhere in a main steam or main feedwater (secondary system) line, accident consequences must be mitigated only by safety grade equipment. However, for the assumed single failure in safety grade equipment, credit may be taken for non-safety grade equipment as a backup.

For those portions of the secondary system where a break might be caused by a seismic event, accident consequences must be mitigated only by seismic Category I components, in accordance with General Design Criterion 2, after assuming single failure in any seismic Category I component.

Your present analyses of the secondary system line break accidents are not based on mitigating the consequences of those accidents by equipment as stated above. In addition, they do not address breaks initiated by a seismic event. For these reasons, the analyses are not acceptable.

If it can be shown that the unmitigated consequences of any secondary system line break accident on this plant are acceptable, considering the above positions and assuming a stuck rod and the availability or unavailability of offsite power, whichever is worse, then the present system design would be considered acceptable.

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Failing this, mitigating equipment must be upgraded, or new equipment added, to conform with the above position and assumptions, and appropriate analyses performed to show acceptable consequences.

In order to assure that licensing actions proceed in a timely manner, you should submit as soon as possible a program outlining and scheduling your planned actions on this matter. If it appears that these actions cannot be completed before the expected fuel loading date, we would give consideration to arguments justifying short term plant operation prior to completion of that program.

Sincerely,

Original signed by
D. B. Vassallo

D. B. Vassallo, Assistant Director
of Light Water Reactors
Division of Project Management

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Metropolitan Edison Company

George F. Trowbridge, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N. W.
Washington, D. C. 20036

Chauncey R. Kepford, Esq.
Chairman
York Committee for a
Safe Environment
2586 Broad Street
York, Pennsylvania 17404

Mr. Richard W. Heward
Project Manager
GPU Service Corporation
260 Cherry Hill Road
Parsippany, New Jersey 07054

Mr. Thomas M. Crimmins, Jr.
Safety and Licensing Manager
GPU Service Corporation
260 Cherry Hill Road
Parsippany, New Jersey 07054