

NRC Pdr  
50-320



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

August 24, 1979

Docket No. 50-320

Mr. John G. Herbein, Vice President  
Nuclear Operation  
Metropolitan-Edison Company  
Trailer Number 120  
Middletown, Pennsylvania 17057

Dear Mr. Herbein:

SUBJECT: NRC COMMENTS TO THE GPU LETTER ON RCS PRESSURE INDICATION DURING  
UNIT 2 SAMPLE LINE TIE-IN, DATED AUGUST 15, 1979

We have reviewed GPU's evaluation of alternate reactor coolant system pressure indication during the tie-in of the new Unit 2 Sample System. Our general comment is that we concur with GPU's recommendation of delaying the sample sink tie-in. We prefer to wait until a direct decay heat removal system would be in operation (e.g., the mini-DHR system). Please note that with the mini-DHR system in service, RCS pressure indication would be available and additional sampling capability would exist. RCS samples withdrawn from this system would be more representative than the samples obtained from the pressurizer.

Secondly, if the sample sink tie-in were to be made, sole reliance on the standby pressure control system for RCS pressure indication would not be a satisfactory practice. Further comments are as follows:

1. If the sample sink modification is required as soon as possible, we would prefer to use the RC pump seal cavity pressure indication for RCS pressure indication as it is more reliable. The standby pressure control (SPC) system is not a proven system and still has a number of problems associated with its operation. Phase II (control from the Unit 2 control room) for the SPC is not yet complete. Using the SPC for RCS pressure indication will mean turning off the RC makeup system (to prevent a possible overpressure transient which the SPC could not handle) and thus there will be no RC pump seal cavity pressure indication. Also, we question the reliability of reading level changes in the SPC surge tank (SPC-T3) for monitoring RCS pressure transients. Further, the pressurizer heaters must be surveyed to assure their inadvertent actuation and a possible overpressure transient.

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2. Consideration should be given to using the existing pressure gauge on the DHR drop line where an additional Heise gauge and DVM are located, just inside the Fuel Handling Building. It is our understanding that this new Heise gauge and DVM have been installed. RCS pressure can be obtained by slightly opening DH-V1 or DH-V171. Since DH-V3 serves as isolation, reactor coolant would go out as far as DH-V3, and all necessary shielding and HP precautions can be taken. There may be some drawbacks to this method such as potential opening of the relief valve in the event of overpressurization of the RCS. However, to our understanding, the sample sink modification will require only 16 hours so the time during which DH-V1 or DH-V171 is open is minimal.

Sincerely,

*John T. Collins*

John T. Collins, Deputy Director  
TMI-2 Support

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