



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

October 12, 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:

During our review of procedures EP-33, "Core Cooling With No RCPS or Natural Circulation", EP-34, "Loss of Natural Circulation", and Z-39, Rev. 3, "Natural Circulation Operation" we have come up with some concerns requiring resolution. These concerns are as follows:

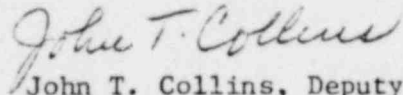
1. Paragraph 6.5.5 of EP-34 references use of OTSG "B" fill procedure R-2-79-045 to go solid in the "B" loop. It should be noted that this procedure specifies a slow fill rate (approximately 20 gpm). The basis for slow fill was to maintain continued natural circulation while steaming on loop "A". A new procedure or a revision to the R-2-79-045 is required to accommodate rapid fill rates under direction of EP-34.
2. Current procedure(s) do not provide guidance to the operator as to when to stop throttling the turbine bypass valve. Continued throttling of the turbine bypass valve may result in system instability. Provide engineering evaluation necessary for operator guidance.
3. Paragraph 3.1.14 of EP-33 references use of OP 2104-4.17 to secure penetration P401 whenever the reactor building water level approaches this penetration. The current version of OP 2104-4.17 is insufficient for securing this penetration in that the 12-inch gate valve isn't closed. This procedure should be revised.

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4. Per note to paragraph 3.8 of Z-39, Rev. 3, and discussions with GPU, it is to our understanding that GPU will perform weekly engineering evaluations of the incore thermocouple reading trends and the statistical application of the thermocouple data for computation of the average incore thermocouple temperature. Written notification will be requested should there be a change in this policy.

Sincerely,



John T. Collins, Deputy Director
TMI Support

cc: R. Vollmer
M. Greenberg
W. Raymond
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