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July 9, 1980
TLL 327

Generic Issues Branch
Attn: Richard Snaider
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Three Mile Island Nuclear Station, Unit I (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Comments on NUREG 0577

Dear Sir:

The remarks included in this letter are in response to your invitation for comments on NUREG 0577, "Potential for Low Fracture Toughness and Lamellar Tearing on PWR Steam Generator and Reactor Coolant Pump Supports." These remarks are focused on one issue. Exception is made to the inclusion of TMI-1 as class 1 susceptibility.

NUREG 0577, Sec. 4.7.2, "Skirt Supported", contains the following statement about the classification of TMI-1: "If the unknown structure mentioned steam generator upper horizontal restraints contains no Group I materials, and if the skirt flange is at a high enough temperature, these facilities, TMI-1 and Rancho Seco-1, might be reclassified." Also, in the same section: "Rancho Seco and TMI-1 must be retained in Group I due to a lack of information. The coolant pump is supported by the piping but is also restrained by horizontal supports attached to the pump motor. (This is a revision to our letter of January 31, 1979 (GQL 0148) concerning reactor coolant pump support.

The attachments to this letter provide the information identified as missing. Attachment 1 concerns the steam generator upper horizontal restraints. Included are detailed drawings of the support structure together with a materials list derived from these drawings. Also included is descriptive information addressing the design criteria for the structure. Attachment 2, for the coolant pipe horizontal support, also contains detailed drawings, a materials list, and the design criteria. This information satisfies Appendix D, "Information to be requested from Group I Licensees."

Attachment 3 is a compilation of the materials used in both the steam generator and coolant pump in terms of susceptibility to brittle fracture. From an inspection of this information it can be concluded that no Group I materials are used in weldments. Group II materials, however, are found in weldments.

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POOR QUALITY PAGES

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ADD NAMES ON
attached list.

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Finally, as per the information requested in Sec. 4.3, Minimum Operating Temperature, the minimum operating temperature for the A 515 base flange of the steam generator is 130°. This information was missing from NUREG 0577.

With the presentation and content of this information about the lateral support of the steam generator and reactor coolant pumps, together with the identification of the minimum operating temperature for the structures, it is anticipated that TMI-I will be reclassified to a lower susceptability classification.

Sincerely,

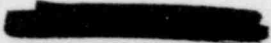
Signed J. G. Herbein

J. G. Herbein
Vice President
TMI-I

JGH:SDL:LWH:Ima

Attachments

cc


J. T. Collins



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

MEMORANDUM FOR: TERA CORPORATION
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LATERAL SUPPORTS ON STEAM GENERATOR

Susceptability Class
by NUREG 0577

by Metallurgical
assessment

- | | | | |
|---|--|-----|-----|
| *1. Links | | | |
| | ASTM A-542-69a, Class 2 | | |
| | A-434-64 Class BD | | |
| | A-514-69a, Gr. F | III | |
| *2. Anchor Weldments | | II | |
| | PI 4" 572-68, Gr. 42 | II | |
| | GAI PI 6" 541-67, Cl. 6, 7, or 8 | | III |
| | 508-68, Cl. 4 or 5 | III | |
| | Base 508 Cl. 2 | III | |
| 3. Pins | | | |
| | 9" ϕ 434-64, Cl. BD | | |
| 4. Shim Pack | | | |
| | A 36-39 | II | |
| | A-43 | I | |
| 5. Anchor Bolt Nuts, Jamnuts & Washers | | | |
| | Nuts 563-66, GRDH | | |
| | Washers | | |
| | 325-68 | III | |
| | Bolts | | |
| | 2 $\frac{1}{4}$ " ϕ 354-66, Type BC | III | |
| Pump Lateral Restraints | | | |
| *1. Ring Girder, Clevis Plates of
Anchor Weldments & Male Clevis
PI Weldments | | | |
| | 633-70 (HSLA) | | II |
| *2. Base PL of Anchor Weldments | | | |
| | 572-70 (HSLA) | II | |
| 3. Pins & Threaded Bolts | | | |
| | 434-64 | | |

*Weldments

#4. Rigid Bars		
API-5LX, Gr. X46		Awaiting Specifications

5. Nuts and Washers		
Washers		
325-686	III	
Nuts		
194-69, Gr. 24	III	

Weld Consumables		
Coolant Pump		
A-633 & A-572 Materials		
AWS E8016-C3		
8016-C2	II	
E8018-C3	II	

Steam Generator		
A 508, 541, 572 Materials		
AWS E7018-A1	II	