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JAN 23 1980
 NRC/TMI-80-003

Docket No. 50-320

Mr. R. C. Arnold
 Senior Vice President
 Metropolitan Edison Company
 100 Interpace Parkway
 Parsippany, NJ 07054

Dear Mr. Arnold:

Subject: Penetration R-401 Temporary Seal

- Reference: 1. NRC letter, J. T. Collins to J. G. Herbein, dated October 12, 1979
 2. GPU letter, TMI-11-R-1129, R. F. Wilson to J. T. Collins, dated November 12, 1979

Item three of our comments, NRC letter, J. T. Collins to J. G. Herbein, dated October 12, 1979, addressed the need to seal Penetration R-401 to contain the Reactor Building sump water if procedure EP-33, "Core Cooling with No Reactor Coolant Pumps or Natural Circulation", were initiated. Procedure EP-33 calls for the injection of water from the Borated Water Storage Tank into the primary system. The injected water is ultimately released to the Reactor Building sump through the pressurizer vent/relief valve pathway.

Your response to our concern, GPU letter, TMI-11-R-1129, described a means to seal Penetration R-401 and you assured us that a procedure was being drafted to perform this operation if necessary. To date we have not received this procedure.

We are concerned that without the capability to seal Penetration R-401 at the containment end, the problems associated with EP-33 implementation will be increased. Additionally a concern exists, even though the Reactor Building water level seems to have stabilized one and one-half feet below penetration R-401, that a seal may be necessary should the level begin to rise from in-leakage.

In your response, please specify when a procedure to seal Penetration R-401 will be available for our review and when the associated hardware will be ready for use.

J. T. Collins, Deputy Director
 NRC/TMI Technical Support Staff

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