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NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

April 16, 1980 NRC/TMI-80-064

Docket No. 50-320

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

Dear Mr. Arnold:

Subject: Mini Decay Heat Removal Overpressurization from Steam Generator Burp

We have reviewed the two letters, TMI-II-R-1219 dated January 9, 1980, and TMI-II-R-1194 dated December 17, 1979, concerning precautions to be taken in preventing the MDHR system from overpressurization due to steam generator "burps". In the latter letter, three options were recommended. They are: (1) maintain letdown at 1.8 gpm when RCS temperature is above 150°F; (2) introduce a gas volume of 38.0 cu. ft. at 80 psi and have no letdown; and (3) reduce Reactor Coolant System (RCS) temperature to below 120°F with the reactor building temperature (RB) maintained above 80°F and have no letdown. It appears that you recommend to implement option (3). We concur, however, we believe that a further study should be performed in order to determine the best way of achieving and maintaining the RCS and RB temperature conditions prior to the MDHR system operation.

Some of our concerns are addressed in the following questions:

- a. What assurance is there in maintaining the RB temperature above 80°F? The RB temperature has ranged from 75°F to 80°F with one pump running, but without the evaporation cooler functioning (our understanding). With RB pump shut off can the temperature climb to higher than 80°F or do fans also have to be shutdown? Secondly, how will the RCS temperature be reduced to and maintained at 120°F?
- b. For option 3, it is stated that letdown will have to be maintained while using the MDHR until the primary system is below 120°F. This will create some waste via the letdown line. We request that you provide information concerning the activation of the OTSC "B" loop long-term cooling system for RCS temperature reduction down to 120°F, and then activation of the MDHR system.

April 16, 1980 Mr. R. C. Arnold In conclusion, we request that the above concerns be evaluated and the results be reflected in the MDHR system operating procedure so as to include appropriate precautions in precluding MDHR overpressurization from steam generator burps. ohu T. Collins Deputy Program Manager TMI Program Office cc: See Distribution List

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