

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
METROPOLITAN EDISON COMPANY)
(Three Mile Island Nuclear)
Station, Unit No. 1))

Docket No. 50-289
(Restart)

LICENSEE'S PREPARED TESTIMONY FOR
FIRST SESSION OF RESTART HEARING

In accordance with the Board's Memorandum and Order dated September 8, 1980, Licensee files herewith testimony on all contentions attached to that Memorandum and Order and on the physical separation of the TMI units, together with related exhibits which Licensee proposes to offer at the hearing. The testimony and exhibits are listed in the attached certificate of service.

Licensee has not attempted in this set of prepared testimony to provide complete answers to all Board questions, including questions on UCS Contention Nos. 6, 8 and 12 which have been adopted by the Board. Some effort has been made, however, to factor the Board's questions into the testimony on contentions where information requested by the Board was readily available. Thus, for example, in connection with our

8009260 313

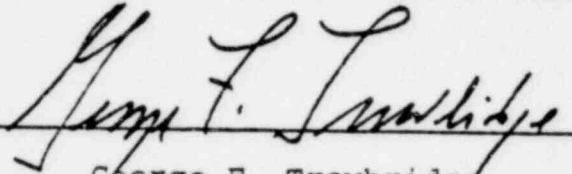
DS03
S 0/1

testimony on UCS Contention 8, we are providing as exhibits the fundamental documents involved in the small break LOCA analysis.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By


George F. Trowbridge

Dated: September 15, 1980

UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-289
)	(Restart)
(Three Mile Island Nuclear)	
Station, Unit No. 1))	


CERTIFICATE OF SERVICE

I hereby certify that the following documents were served upon the parties identified on the attached Service List by deposit in the United States mail, first class, postage prepaid, this 15th day of September, 1980:

1. Licensee's Testimony of Robert W. Keaten and Robert C. Jones in Response to UCS Contention Nos. 1 and 2 (Natural and Forced Circulation);
2. Licensee's Testimony of Robert C. Jones, Jr., and T. Gary Broughton in Response to UCS Contention No. 8 and ECNP Contention No. 1(e) (Additional LOCA Analysis);
3. Exhibit: Topical Report, BAW-10103A, Rev. 3, "ECCS Analysis of B&W's 177-FA Lowered Loop NSSS," July 1977;
4. Exhibit: Letter dated July 18, 1978 from J.H. Taylor, Babcock & Wilcox, to S.A. Varga, NRC, attaching additional ECCS small break analyses;
5. Exhibit: "Evaluation of Transient Behavior and Small Reactor Coolant System Breaks in the 177 Fuel Assembly Plant," Volume I, Section 6, "Small Break Analyses," May 7, 1979;

6. Exhibit: "Small Break in the Pressurizer (PORV) with No Auxiliary Feedwater and Single Failure of the ECCS," Supplement 1 to the May 7, 1979 Small Break Analyses (May 12, 1979);
7. Exhibit: "Small Break in the Pressurizer (PORV) with No Auxiliary Feedwater and Single Failure of the ECCS with Realistic Decay Heat," Supplement 2 to the May 7, 1979 Small Break Analyses (May 12, 1979);
8. Exhibit: "Auxiliary Feedwater Flow Required for LOCA," Supplement 3 to the May 7, 1979 Small Break Analyses (May 24, 1979);
9. Exhibit: B&W Document 86-1103585-00, "System Response to Total Loss of SG Heat Sink," (August 7, 1979);
10. Exhibit: Report, "Analysis Summary in Support of an Early RC Pump Trip," (August 21, 1979);
11. Exhibit: "Supplemental Small Break Analysis," Supplement to the August 21, 1979 Analysis in Support of an Early RC Pump Trip (September 12, 1979);
12. Exhibit: B&W Document 69-1106001-00, "Small Break Operating Guidelines," November, 1979;
13. Exhibit: B&W Document 86-1117679-000, "Small Break With Failed PORV," (February 11, 1980);
14. Licensee's Testimony of Robert W. Keaten, Michael J. Ross and Robert C. Jones, Jr. in Response to UCS Contention No. 7, ANGRY Contention No. V(B) and Sholly Contention No. 6(b) (Detection of Inadequate Core Cooling);
15. Licensee's Testimony of Philip R. Clark, Michael J. Ross and E. S. Patterson in Response to UCS Contention No. 10 and Sholly Contention No. 3 (Safety System Bypass and Override);
16. Licensee's Testimony of Robert W. Keaten, George R. Braulke and George J. Brazill in Response to UCS Contention No. 12, UCS Contention No. 14 and UCS Contention No. 3 (Safety Classification);

17. Licensee's Testimony of James H. Correa, Gary T. Urquhart and Robert C. Jones, Jr. in Response to UCS Contentions 5 and 6 (Valves and Valve Testing);
18. Exhibit: Topical Report, BAW-10043, "Overpressure Protection for Babcock & Wilcox Pressurized Water Reactors," May 1972;
19. Licensee's Testimony of Joseph A. Torcivia and Paul J. Shipper, Jr. in Response to UCS Contention No. 4 (Connection of Pressurizer Heater to Diesel);
20. Licensee's Testimony of T. Gary Broughton, Gerald J. Sadauskas and Luther L. Joyner in Response to Sholly Contention No. 6(a) (Integrated Control System);
21. Licensee's Testimony of Louis C. Lanese in Response to Sholly Contention No. 1 (Containment Isolation);
22. Licensee's Testimony of William F. Itschner, Richard Barley, James Moore and Charles Pelletier in Response to the Lewis Contention and ANGRY Contention No. V(D) (Filters);
23. Licensee's Testimony of Patrick S. Walsh, William E. Meek, Herbert Estrada, Jr., Julien M. Christensen and Thomas B. Sheridan in Response to Sholly Contention No. 15 and ANGRY Contention No. V(C) (Control Room Design-Human Factors Engineering);
24. Licensee's Testimony of William P. Hamilton and Robert W. Keaten in Response to Sholly Contention No. 13 and ECNP Contention No. 1(a) (Computer);
25. Licensee's Testimony of Patrick S. Walsh and Ronald J. Toole in Response to UCS Contention No. 9 and ECNP Contention No. 1(c) (Safety System Status Panel);
26. Licensee's Testimony of T. Gary Broughton, Richard W. Dubiel and Victor H. Willems in Response to Sholly Contention No. 5 and ECNP Contention No. 1(d) (Instrument Ranges (In Plant)); and
27. Licensee's Testimony of Edwin C. Fuhrer and Richard J. McGoey on the Physical Separation of Three Mile Island Units 1 and 2.


Thomas A. Baxter

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
METROPOLITAN EDISON COMPANY) Docket No. 50-289
) (Restart)
(Three Mile Island Nuclear)
Station, Unit No. 1))

SERVICE LIST

Ivan W. Smith, Esquire
Chairman
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Walter H. Jordan
Atomic Safety and Licensing
Board Panel
881 West Outer Drive
Oak Ridge, Tennessee 37830

Dr. Linda W. Little
Atomic Safety and Licensing
Board Panel
5000 Hermitage Drive
Raleigh, North Carolina 27612

James R. Tourtellotte, Esquire
Office of the Executive Legal Director
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

John A. Levin, Esquire
Assistant Counsel
Pennsylvania Public Utility Comm'n
Post Office Box 3265
Harrisburg, Pennsylvania 17120

Karin W. Carter, Esquire
Assistant Attorney General
505 Executive House
Post Office Box 2357
Harrisburg, Pennsylvania 17120

John E. Minnich
Chairman, Dauphin County Board
of Commissioners
Dauphin County Courthouse
Front and Market Streets
Harrisburg, Pennsylvania 17101

Walter W. Cohen, Esquire
Consumer Advocate
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, Pennsylvania 17127

Jordan D. Cunningham, Esquire
Attorney for Newberry Township
T.M.I. Steering Committee
2320 North Second Street
Harrisburg, Pennsylvania 17110

Theodore A. Adler, Esquire
Widoff Reager Selkowitz & Adler
Post Office Box 1547
Harrisburg, Pennsylvania 17105

Ellyn R. Weiss, Esquire
Attorney for the Union of Concerned
Scientists
Harmon & Weiss
1725 Eye Street, N.W., Suite 506
Washington, D.C. 20006

Steven C. Sholly
304 South Market Street
Mechanicsburg, Pennsylvania 17055

Daniel M. Pell, Esquire
ANGRY
32 South Beaver Street
York, Pennsylvania 17401

William S. Jordan, III, Esquire
Attorney for People Against Nuclear
Energy
Harmon & Weiss
1725 Eye Street, N.W., Suite 506
Washington, D.C. 20006

Robert Q. Pollard
609 Montpelier Street
Baltimore, Maryland 21218

Chauncey Kepford
Judith H. Johnsrud
Environmental Coalition on Nuclear
Power
433 Orlando Avenue
State College, Pennsylvania 16801

Marvin I. Lewis
6504 Bradford Terrace
Philadelphia, Pennsylvania 19149

Marjorie M. Aamodt
R. D. 5
Coatesville, Pennsylvania 19320