

February 28, 1981
L1L 054Office of Nuclear Reactor Regulation
Attn: R. W. Reid, Chief
Operating Reactors Branch No. 4
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Inadequate Core Cooling/Special Low Power Test

References:

1. Letter, dated January 23, 1981 (TLL-680) to D. Eisenhut, "Response to NUREG 0737"
2. Letter, dated February 13, 1981 (L1L-044) to Commissioners Ahearne and Hendrie, "TMI-1 Restart Schedule"

A. Inadequate Core Cooling Procedures

In response to your letter of January 28, 1981, it is our intention to continue to develop ICC procedures and provide supporting documentation (Option No. 1). Please be advised that some guidelines are undergoing revision and changes will be incorporated into these procedures as required. Additionally, we believe it would be more productive if NRC representatives visit TMI after April 1, 1981 in order to review the supporting documentation and the approved procedures. The following information concerning procedure guidelines is provided:

1. Small Break LOCA* - the B&W generic guidelines, together with a summary of the supporting analyses, were provided in the Restart Report, Supplement 1, Part 2, Question 45. Further information on the supporting analyses is contained in the B&W "Evaluation of Transient Behavior and Small Reactor Coolant System Breaks in the 177 Fuel Assembly Plant," May 7, 1979 (commonly called the "Blue Books"). The guidelines and analyses have been incorporated into the applicable emergency procedure (EP-1202-6B).
2. Steam Generator Tube Rupture - No TMI-1 plant specific guidelines or analyses exist. The existing procedure (EP-1202-5) was developed using draft B&W generic guidelines, B&W simulator training information, NUREG-0651, and draft ATOG guidelines.

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3. Loss of Main Feedwater - No generic B&W guidelines exist; however, loss of Main Feedwater (MFW) was studied as part of the B&W "Blue Books," May 7, 1979 (Section 4.0). Additional insight can be gained from the loss of MFW analyses presented in Appendix 8A of the Restart Report. The procedures (EP-1202-26A/B) were developed using the B&W simulator and the B&W analyses, not the Restart Report analyses.
4. Inadequate Core Cooling (ICC)* - the procedure (EP-1202-39) for ICC was developed using the analyses and guidelines discussed under Item 1 above.

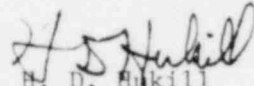
*Substantial information concerning these items was presented in the TMI-1 Restart Hearing proceedings by Licensee's witnesses Jones and Broughton and NRC's witness Jensen in response to Union of Concerned Scientists' Contention No. 8.

Procedures for the categories listed above will be available for NRC review on April 1, 1981. At this time, a B&W simulator demonstration would be unwarranted because of recently performed simulator training by all licensed operators on emergency procedures nearly identical to those which will be finalized by April 1, 1981. The TMI-1 Control Room walk thru can be scheduled following the review of guidelines and procedures, but not to interfere with the licensing examination process.

B. Special Low Power Test Program (I.G.1)

As requested in your letter of January 28, 1981, we plan to provide a copy of the Restart Test Specification which includes the low power testing program by May 1, 1981. During April 1981, prior to this submittal, we would be available to meet with representatives of your staff at TMI to ensure our submittal is responsive to your information needs. As you suggest, appropriate safety evaluations, procedures and sufficient supporting information will be provided as a result of discussions which follow our submittal.

Sincerely,


H. D. Hukill
Director, TMI-1

HDH:EGW:LWH:hah

cc: H. Silver
D. DiIanni
L. Barrett
B. Grier