

March 3, 1981
LIL 036Office of Nuclear Reactor Regulation
Attn: Mr. D. G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Response to NUREG-0737, Item II.D.1

As a sponsor of the EPRI Safety and Relief Valve Test Program, Met-Ed intends to comply with the technical requirements of NUREG-0578, Item 2.1.2. In December 1980, R.C. Youngdahl of Consumers Power Company provided the current PWR Utilities' positions on NUREG-0737, Item II.D.1 clarifications. Briefly, those positions are:

- A. Safety and Relief Valves and Piping: The EPRI "Program Plan for Performance Testing of PWR Safety and Relief Valves," Revision 1, dated July 1, 1980, does provide a program that satisfies the NRC requirements. Discussion with the NRC staff and their consultants are resolving specific detailed issues.
- B. Block Valves: The EPRI Program has not formally included the testing of block valves. However, a small number of block valves have been tested at the Marshall Steam Station Test Facility. The PWR Utilities and EPRI cannot provide a detailed block valve test program until results of the Wyle and C-E relief valve tests are available. Therefore, a block valve test program will not be provided before July 1981. The PWR Utilities and EPRI believe that the proper operation of the TMI-2 and Crystal River block valves and other operational experience, plus knowledge of the Marshall tests, support a less hurried and more rational approach to block valve testing.
- C. ATWS Testing: PWR Utilities will not support additional efforts for ATWS valve testing until regulatory issues are resolved. The major safety and relief valve test facility (C-E) is nearing completion and some measures were taken to provide additional test capability beyond the current program requirements. The NRC should

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recognize that results from the current program are likely to provide most of the information necessary to address ATWS events (i.e., relief capability at high pressure).

We endorse the EPRI Program as described in Mr. Youngdahl's December letter and adopt them as our response for TMI-1.

Sincerely,


A. D. Hukill
Director, TMI-1

HDH:CWS:bjc
cc: D. DiIanni
R. W. Reid
H. Silver