

Union of
**CONCERNED
SCIENTISTS**

DOCKET #
PROD. & UTIL. FAC. 50c 289

July 2, 1981

James M Cutchin, IV
U.S. Nuclear Regulatory Commission
Office of Legal Director
Washington, D.C. 20555

Thomas Baxter
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036

Gentlemen:

By now you have had the opportunity to review the 84 work sheets selected by UCS from the licensee's January 30, 1981 submittal to NRC on the environmental qualification of equipment in TMJ-1.

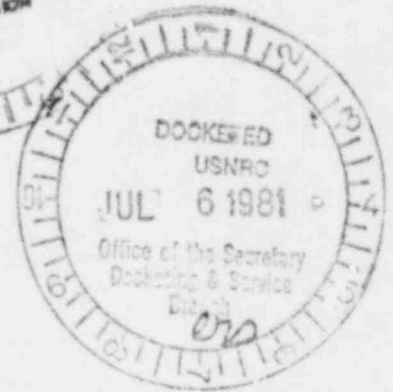
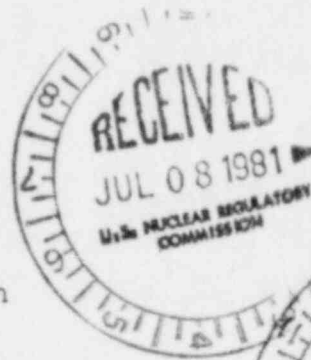
Pursuant to the agreement of the parties to find an alternative to questioning Mssrs. Rosztoczy and LaGrange to establish the basis for admissibility of these worksheets, we are hereby responding to the requests of Mssrs. Baxter and Cutchin.

The following pages of UCS 39 are duplicated in Staff Exhibit 16: 4, 27-37, 40, 41, 46-50, 54-73, 80 and 82-84. In addition to some of these, pages 13 and 39 were used during cross-examination.

Beyond this, Mr. Baxter asked us to identify the reasons why we had selected these particular worksheets (eg., Tr. 22069). For all of the other worksheets, that information is as follows:

The following pages of UCS Ex. 39 contain information on components identified by the Licensee in the master list for cold shutdown (which is included in UCS Ex. 38) and indicate deficiencies in qualification:

Pages 8-12, 26, 42-45, and 74-79.



DS03
S
/10

Pages 1, 2, and 3 of UCS Ex. 39 pertain to equipment located inside containment (and thus exposed to the SBLOCA environment) used to isolate feedwater in the event of a steam line rupture. Their failure in the LOCA environment could lead to isolation of feedwater during a LOCA.

Pages 5, 6, 7, 22, 24, and 25 contain information showing that equipment which may be used to cope with SBLOCA is not qualified even for the ambient conditions at their locations.

Pages 14-26 illustrate the extent of qualification of EPW/MFW equipment reflecting on the adequacy of the Staff's feedwater reliability assessment and extent of compliance with lessons learned requirements re: feedwater transients and EPW reliability.

This responds to the questions you posed. I therefore propose that the material marked as UCS Exhibit 39 be stipulated into evidence in order to obviate the need to do more questioning of the witnesses. Please let me know if you are agreeable so we can notify the Board.

Very truly yours,



Ellyn R. Weiss

cc: Service list