

AUG 23 1982

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Docket No. 50-289

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Mr. Henry D. Hukill, Vice President
 GPU Nuclear Corporation
 P. O. Box 480
 Middletown, Pennsylvania 17057

Dear Mr. Hukill:

Your letter dated April 30, 1982, requested written advice from the NRC Staff on the requirement for a hearing regarding the proposed repair and return to service of the Three Mile Island, Unit 1 (TMI-1) steam generators. Although you have not yet submitted a safety evaluation of the steam generator problem to the NRC, we can offer our current views based on information provided to date by General Public Utilities Nuclear (GPUN) at several meetings.

We do not agree that the proposed repairs and subsequent return to service of the steam generators can be accomplished under 10 CFR 50.59 without NRC approval and issuance of a license amendment.

First, the steam generator problem contains several aspects that appear to involve unreviewed safety questions. Our major concerns are:

- 1) The corrosion mechanism and extent of corrosion in the steam generators is unique. The Staff has not reviewed the potential consequences of additional plant operation subsequent to the repair of the defects. In particular, the potential for this type of corrosion to reinitiate during operation and rapidly progress adversely affecting the steam generator primary pressure boundary, will need to be reviewed by the Staff.
- 2) The potential exists for this type of corrosion to attack other primary pressure boundary materials.
- 3) The proposed tube repair technique has not previously been approved by the staff as an acceptable method for repairing defective steam generator tubes.

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SURNAME ▶							
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Second, because the portion of the tube within the tube sheet contains defects greater than 40% throughwall and your repair method for the majority of these defects will not involve plugging, an amendment to the Technical Specification (TS) 4.19 will be needed prior to return to power operation. We do not agree with your analysis of the intent of TS 4.19. In the Staff's view, this section of the TS applies to the existing condition of the steam generators and not to the condition following repair. We do agree that once the repair is completed, the portion of the tube within the tube sheet which has been sealed is no longer a reactor coolant pressure boundary.

With respect to your request for our views on the requirement for a hearing, we consider it is premature to make such a determination. To date we have not identified concerns which would involve a significant hazards consideration and thus require the Staff to prenotice the actions involving approval of the repairs and amendment of TS 4.19. However, to make a final determination we need the remaining inspection results and your final safety evaluation.

We trust that the Staff's views discussed herein may be of use in your planning. Meanwhile, we request that you submit, as early as possible, a TS amendment application with supporting analysis and evaluation for Staff review.

Sincerely,

Original signed by
Darrell G. Eisenhut

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

cc:
See next page

*See previous NRC 318 for concurrence

OFFICE	ORB#4:DL	C-ORB#4:DL	AD-OR:DL	AD-SA:DL	D:DE	OELD	D:DL
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DATE	8/16/82	6/17/82	6/17/82	6/18/82	6/22/82	6/22/82	8/20/82

Mr. Henry D. Hukill

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Second, because the portion of the tube within the tubesheet contains defects greater than 40% throughwall and your repair method for the majority of these defects will not involve plugging, an amendment to the Technical Specification (TS) 4.19 will be needed prior to return to power operation. We do not agree with your analysis of the intent of TS 4.19. In the Staff's view, this section of the TS applies to the existing condition of the steam generators and not to the condition following repair. We do agree that once the repair is completed, the portion of the tube within the tubesheet which has been sealed is no longer a reactor coolant pressure boundary.

With respect to your request for our views on the requirement for a hearing, we consider it is premature to make such a determination. To date we have not identified concerns which would involve a significant hazards consideration and thus require the Staff to prenotice the action. However, to make a final determination we need the remaining inspection results and your final safety evaluation.

We trust that the Staff's views discussed herein may be of use in your planning. Meanwhile, we request that you submit, as early as possible, a TS amendment application with supporting analysis and evaluation for Staff review.

Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

ccc:
See next page

*See previous NRC 318 for concurrence.

OFFICE	ORB#4:DL	C-ORB#4:DL	AD-OR:DL	AD-SA:DL	D:DE	OELD	D:DL
SURNAME	RJacobs*	JStolz/cab	TNovak*	GLinas	RWollmer	CUTCHIN	DEisenhut
DATE	6/16/82	6/17/82	6/17/82	6/18/82	6/27/82	6/27/82	6/ /82

Mr. Henry D. Hukill

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Secondly, we believe that an amendment to the Technical Specification (TS) 4.19 will be needed prior to return to power operation. Since the portion of the tube within the tubesheet contains defects greater than 40% throughwall and since your repair method for the majority of these defects will not involve plugging, we conclude that you cannot comply with TS 4.19.4b and declare the steam generators to be operable, without an amendment. We do not agree with your analysis of the intent of TS 4.19. While we agree that once the repair is completed, the portion of the tube within the tubesheet which has been sealed is no longer a reactor coolant pressure boundary. In the Staff's view, this section of the TS applies to the existing condition of the steam generators and not following repair. This is the same acceptance criterion and definition of tube inspection that is used in Standard Technical Specifications for B&W plants.

With respect to your request on the requirement for a hearing, we feel it is premature to make such a determination. To date we have not identified a significant hazards consideration concern which would require the Staff to prenotice the action and thus, offer opportunity for a hearing. However, the remaining inspection results and your final safety evaluation are needed for a final determination.

We trust that the Staff's views discussed herein may be of use in your planning. Meanwhile, we request that you submit, as early as possible, an amendment application and supporting analysis and evaluation related to the steam generator for Staff review.

Sincerely,

Darrell G. Eisenhut, Director
 Division of Licensing
 Office of Nuclear Reactor Regulation

ccc:
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