

1. The cooling mode is alleged to have worked in U-tube configuration;
2. The basic phenomena are well understood and "appear to have occurred" during the TMI-2 accident;
3. The mode has been "predicted" by the B&W computer model.

Licensee's Response, at 5,6.

The first point is irrelevant since the TMI-1 steam generators are not U-tube configurations. In a U-tube configuration, the tubes are the highest point in the system, where steam would collect, and are covered by water. On the contrary, in the B&W design, the high point of the system is the candy cane in the hot-leg, where no cooling by emergency feedwater is available. Furthermore, if the TMI-1 operators follow their emergency procedures which unequivocally direct the operators to leave the HPI pumps running, this will prevent the steam bubble from expanding into the steam generator tubes and force the plant into feed and bleed. Licensee's attempt to take credit for a cooling mode alleged to be demonstrated in a U-tube configuration is grossly irresponsible, since the TMI-1 configuration and the phenomena occurring during boiler-condenser cooling in the B&W design are entirely different and since TMI-1 emergency procedures virtually preclude establishment of boiler-condenser.

Licensee's second point is that the "basic phenomena" are well understood and "appear to have occurred" during the TMI-2 accident. While we are unclear what "basic phenomena" are here referred to, we would agree that it is well understood that steam when cooled will condense. The pertinent fact is that the location of the steam bubble--at the top of the hot-leg candy cane--precludes its being cooled. Almost four years after the accident, if all the Licensee can claim is that the "basic phenomena" "appear to have occurred" during the accident, that is a remarkably weak reed upon which to ask the Commission to conclude that boiler-condenser is a viable cooling mode for TMI-1. While