



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

September 2, 1983

Docket No. 50-289

MEMORANDUM FOR: Chairman Palladino  
Commissioner Gilinsky  
Commissioner Roberts  
Commissioner Asselstine  
Commissioner Bernthal

FROM: Darrell G. Eisenhut, Director, Division of Licensing, NRR

SUBJECT: BOARD NOTIFICATION (BN-83-138 ) TMI-1 RESTART HEARING

The NRC Staff is currently looking into the matter of possible incidents of falsification of reactor coolant system (RCS) leak rate tests at TMI-1 prior to the accident at TMI-2. This inspection by Region I is not yet completed; however, an examination of certain TMI-1 site records reviewed in conjunction with this inspection suggest that a statement previously made by the Staff in the TMI-1 restart proceeding, and believed to be accurate at the time, may prove to be incorrect. The statement in question arises out of the NRC investigation of the Hartman allegations of falsification of leak rate test data at TMI-2 and is contained in NUREG-0680, Supp. No. 2 (March 1981). Specifically, the Staff stated in that document that:

"Further, although the NRC investigation is not complete, and the examination of Unit 1 records was limited, no indication of practices at Unit 1 similar to those alleged at Unit 2 were identified."

By way of background, the basis for the above-quoted statement in NUREG-0680 Supp. 2 was a draft document written by Mr. Keith Christopher in April 1980 (a copy of which is attached) which was provided to Mr. Tim Martin at that time. Mr. Christopher was a Region I investigator assigned to the investigation of Mr. Hartman's allegations and Mr. Martin was the Investigation Team Leader. During the course of that investigation, which was not completed because of the referral of the Hartman allegations to the Department of Justice, Mr. Christopher performed a limited review of TMI-1 documents relating to leak rate calculations. He reviewed approximately

1200 RCS leak rate test records generated at TMI-1 during the period April 26, 1978 to December 31, 1978. Four of these records appeared to represent results of tests during which the Control Room Operator (CRO) log indicated water had been added to the RCS and the computer test records indicated that this information had not been logged into the computer. Nevertheless, at the time NUREG-0680, Supp. 2, was issued, it was concluded that there was no indication of practices at Unit 1 similar to those alleged at Unit 2 for the following reasons.

1. Hartman made no allegation that any of the practices he maintained occurred at TMI-2 also occurred at TMI-1; moreover, during his extended examination by NRC investigators, they were left with the distinct impression that the problems identified by Hartman were isolated to Unit 2, because he contrasted the problems at Unit 2 with his positive perceptions of the construction and operations at Unit 1;
2. The acceptance criteria for TMI-1 leak rate tests was less stringent than for TMI-2, due to the additional consideration of a 0.51 GPM evaporative loss factor;
3. The dates of the four records in question and the personnel involved showed no consistent pattern;
4. The number of TMI-1 records in question constituted one-third percent (0.33%) error rate, which was not comparable to the seven percent error rate found at TMI-2; and,
5. The leak rate test records found in question had a number of possible benign explanations; therefore, they were not in themselves indications of falsified leak rate test records.

Although the ongoing staff inspection has called into question whether the four examples cited earlier are valid, the current inspection, which is more extensive than the limited examination of Unit 1 records that was conducted in 1980, has raised new staff concerns relative to the way leak rate testing was conducted at TMI-1.

The present staff inspection should be completed in the next several weeks and a referral to the Office of Investigations for additional review is expected. However, when the inspection report has been completed, the staff



EXAMINATION OF TMI #1 REACTOR  
COOLANT INVENTORY SURVEILLANCE TEST RESULTS

Commenced 4-9-80 the Computer  
Printout Results for the Unit 1 Reactor  
coolant inventory test were examined  
a <sup>TIMS</sup> period ~~of~~ <sup>of</sup> ~~the~~ 4-26-78 to 12-31  
approximately 1200 leak test results  
were examined. Based on the computer  
stated ~~total~~ <sup>total and</sup> duration of the leak test  
rate tests in comparison with ~~the~~ <sup>the</sup> entries  
the Control Room operators log, four (4)  
incidents were discovered in which  
water was added to the Makeup Tank  
without a corresponding input interface  
to the computer identifying this addition.  
In addition ~~was~~ <sup>was</sup> an examination  
of the Makeup Tank ~~to~~ <sup>to</sup> ~~the~~ <sup>the</sup> ~~computer~~  
that water was ~~added~~ <sup>in fact</sup> added ~~to~~  
during the leak test time intervals.  
The following time periods and  
Personnel involved in these incidents  
are as follows:

	00:56	2045	100 GAL
2)	23:55-00:55	00:30	250 "
5)	23:38-00:38	2350	300 "
1)	18:42-19:42	1858	200 "

[AT THE REQUEST OF THE COMMISSION'S OFFICE OF INVESTIGATIONS,  
 DATES AND NAMES OF INDIVIDUALS HAVE BEEN DELETED ON THE GROUNDS  
 THAT RELEASE OF SUCH INFORMATION COULD IMPEDE THE ANTICIPATED  
 REVIEW BY THAT OFFICE.]