

SEP 26 1984

DMB 016

Docket No. 50-289

Mr. Henry D. Hukill, Vice President
and Director - TMI-1
GPU Nuclear Corporation
P. O. Box 480
Middletown, Pennsylvania 17057

Dear Mr. Hukill:

On September 6-7, 1984, the staff and a consultant from EG&G, Idaho conducted a special audit of the TMI-1 environmental qualification (EQ) files as part of its review related to the restart proceeding environmental qualification certification requirement imposed by the Commission in CLI-84-11, dated July 26, 1984. The audit focused on (1) the list of equipment from your August 23, 1984 submittal that you believe falls within the scope of the Commission's Order, (2) the specific environmental qualification files for the selected components and (3) your proposed justification for interim operation for the incore thermocouples from your August 23, 1984 submittal. The audit findings were, in general, favorable. However, the following comments will have to be resolved prior to staff certification of this issue.

With respect to identifying equipment subject to the Commission's Order, there are three components, in the staff's view, that should be added to the list. These components are (1) the pressure switches for the high pressure injector auxiliary oil pumps, (2) the high pressure injection auxiliary oil pumps, and (3) the high pressure injection flow indication. In addition, the decay heat removal flow indication should be qualified for normal operation radiation doses. As discussed, the procedural revisions proposed to permit excluding makeup tank level indication from the list need to be implemented prior to staff certification of this item.

With respect to the file audit, the staff and a consultant from EG&G, Idaho, reviewed in detail the documentation in eight EQ files and found that seven files contained documentation that provided adequate evidence the equipment was qualified for the radiation levels postulated to exist following a large break LOCA. The staff found the documentation in the remaining file it reviewed, transorb diodes, to be deficient. That file contained test results, but did not contain the test report itself. The test report must be reviewed by GPU and the review results included in the file. The test report itself must also be placed in the file or available to GPU for the installed life of the diodes.

Mr. Henry D. Hukill

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With respect to the JCO for the incore thermocouples, the staff found the JCO unacceptable. Citing operating experience to one megared gamma integrated dose does not provide an adequate basis for concluding that the equipment will perform its function up to an integrated dose 20 times greater, nor have the failure of the six units in TMI-2 been adequately explained. Acceptable criteria for demonstrating JCO was provided to you in our letter of May 25, 1984. Those criteria are essentially the same as those contained in paragraph (i) of 10 CFR 50.49. With regard to our May 25, 1984 letter, we reiterate our request that you respond to that letter in order to enable the staff to continue its review and evaluation concerning compliance with 10 CFR 50.49 for TMI-1.

We request that you provide written resolution for the issues above as soon as possible, but in any event no later than October 12, 1984.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

"ORIGINAL SIGNED BY:"

Darrell G. Eisenhut, Director
Division of Licensing

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The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

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