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James R. Floyd
P.O. Box 268
Elizabethtown, PA 17022

August 13, 1984

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Honorable Nunzio J. Palladino
Chairman, U.S. Nuclear
Regulatory Commission
Washington, D.C. 20555

Re: NUREG-0680, Supplement No. 5
-- Conclusions with Respect
to Leak Rate Tests at TMI-2

Dear Chairman Palladino:

I am writing to you to protest the treatment of me in the NRC's Staff Report on TMI-1 Restart, NUREG-0680, Supplement No. 5. My letter concerns only the Staff's conclusions about reactor coolant system leak rate tests at TMI-2.

The Report concludes that I was "involved or implicated in" the indictment of Met Ed based on the United States Attorney's Statement of Facts. It is my belief that the United States Attorney's Statement of Facts drew conclusions with respect to me that are misleading, out of context or erroneous. In addition it was unfair of your staff to disregard Met Ed's statement. Furthermore, the Report does not refer to my Supervisor of Operations Memorandum No. 78-19, which instructed TMI-2 operators to immediately invoke the action statement when the limiting conditions for operation were not met. A copy of my memorandum is attached.

You will note that my memorandum discusses rounding off leak rate test results. That was done for a brief period following Mr. Haverkamp's instruction that we could do so. (Mr. Haverkamp was the NRC's Resident Inspector.) When Mr. Haverkamp's superiors overruled him on the rounding off issue, we stopped rounding off.

Nevertheless, the memorandum clearly instructed operators to immediately invoke the action statement of the Technical Specifications when limiting conditions for operation were met. After the memorandum was distributed on October 20, 1978, I do not recall having leak rate test problems brought to my attention.

Thus, I think that the conclusions about reactor coolant system leak rate tests in NUREG-0680 Supplement No. 5 are unfair. I would appreciate it if you and the other Commissioners would refuse to endorse the Staff's conclusions about me.

Very truly yours,

James R. Floyd
James R. Floyd

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Enclosure

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METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject RCS LEAKAGE TECH SPEC.
UNIT II SUPERVISOR OF OPERATIONS MEMO 2-78-19

Location TMI Nuclear Station
Middletown, Pa.
Date Oct. 20, 1978

To UNIT II SHIFT SUPERVISORS/SHIFT FOREMEN

1. The 555 computer program "RCSL" has been modified to output the unidentified leakage as a whole number; ie. 0, 1, 2, 3, ... etc.
2. If the unidentified leakage is equal to or greater than 2 gpm, then the 4-hour time clock commences with the output time of the printout ie. the time the final data was taken.
3. To assist in the identification of leakage within the 4-hour clock, a list of known and measured leaks will be maintained by the Shift Foremen Unit II.



J. R. Floyd
Supervisor of Operations - Unit II

JRF:je

cc: B. L. Lutz
G. P. Miller
J. L. Seelinger
M. J. Ross
Control Room Ops. Memo Book - Unit II
Ops. Office Memo Book