

SEP 02 1983

MEMORANDUM FOR: Thomas E. Murley, Regional Administrator
THRU: Thomas T. Martin, Director, Division of Engineering and
Technical Programs
FROM: Stewart D. Ebnetter, Chief, Engineering Programs Branch, DETP
SUBJECT: INSPECTION - TMI-I REACTOR COOLANT LEAK RATE TEST

Background

1. This memorandum is in reference to the GPU letter dated August 18, 1983, on TMI-I leak rate calculations which implied the Region I Technical Staff had provided the GPU staff with a "list" of missing records and irregularities.

I met individually with all of the Region I regional staff members that participated in the inspection and subsequently had a group meeting's with the team. In the individual meetings we discussed each participants role in the inspection, the manner in which he had conducted the inspection, and the means by which he interfaced with the licensee. Particular emphasis was placed on communications with the licensee. During the group session we reconstructed, to the degree possible, the inspection conduct and chronology of the inspection. See attachment hereto.

2. Conduct of the Inspection

- a. Meetings

- 1). On July 11, 1983, the inspection team met with the licensee (Mr. Hukill, C. Smyth, et al) in the NRC onsite trailer and informed the licensee of the scope of the inspection. Mr. Henry Shipman of the TMI-I staff was assigned as GPU Technical Coordinator to work with the team.
- 2). No other formal meetings were held with the licensee throughout the inspection.
- 3). There was no formal (or informal) exit meeting with either the licensee or NRC.

b. Communications

- 1). Written Communication - There was no written communication with the licensee; no written material was provided to the licensee in relation to findings, conclusions, facts, dates, problems, or any item of significance. One team member whose responsibility was to gather records stated he had written down a few record numbers on a pieces of scrap paper and asked the licensee to make those records available.

All team members stated that the team leader had clearly instructed them not to make any information available to the licensee. One team member also referenced Thomas T. Martin's memo and one other stated he knew of the sensitivity of providing written notes to licensee from the discussions at the regional resident counter-part meeting.

- 2). Informal contacts with the GPU staff, such as document control clerks control room operations, and engineers were made throughout the inspection as a normal inspection procedure.

There were no formal interviews of GPU personnel; only informal working level contacts to discuss leak rate tests and records. All transmittal of information was by verbal means.

One of the "lists" in question, (Enclosure 1 to the referenced letter), was verbally provided to the licensee to identify (records) information that was missing or unavailable but was needed by the team to complete the inspection. This is normal procedure during inspections. It was a verbal request for the licensee to retrieve records related to the time period in question.

The other lists could have been compiled by the licensee as a result of informal discussions throughout the inspection with the GPU assigned interface (Henry Shipman). During these discussions, the leak rate test inadequacies were discussed. One informal discussion was held during the week of August 1, 1983 with a GPU - Parsippany engineer who visited the NRC office to pick up some of the original strip charts for GPU analysis. The team discussed the problem of water/hydrogen additions and specific dates with the GPU representative during this informal meeting. No written material was provided, and no charts, graphs, calculations, notes, etc., was provided by the NRC team.

Dr. Chung did not provide any list identifying apparent irregularities or missing calculations to Henry Shipman on August 9, 1983 or at any other time. The reference to August 9 is apparently related to a question from Henry Shipman, after he was informed that there would be no exit meeting. Mr. Shipman asked if his (Dr. Chung's) concerns were still valid and Dr. Chung indicated that concerns verbally discussed previously were still valid.

3. Records

All records were signed out by NRC personnel and taken to the NRC office in Middletown. This assured minimum opportunity for the licensee to observe NRC notes/records and limited verbal exchanges.

The fact that all records utilized by NRC in the inspection were signed out in GPU record logs also provided a means to develop the information in the "lists".

Most requests for records were verbal although there were a few cases as noted previously in which the request was forwarded informally on a piece of scrap paper.

4. Transmittal of Findings

No inspection findings were transmitted to the licensee, either in written or verbal form. Requests by the licensee for written information were refused by the team.

Requests for missing facts (records) were done verbally and specific technical concerns with respective dates were identified to aid in understanding of the problem, to provide examples of concerns and served as the basis for performing a demonstration of real time tests.

No formal meetings, with the exception of the entrance meetings were conducted.

The planned exit interview, scheduled for August 10, 1983, was cancelled. The licensee objected.

Stewart D. Ebnetter, Chief
Engineering Programs Branch

OVERVIEW TMI-I LEAK RATE INSPECTION

July 11-15, 1983

Start Inspection at TMI-I on July 11, 1983 (Dr. Chung, E. Vanterpool). Entrance meeting held in NRC trailer on TMI site.

Initiated gathering of records from TMI-2 administration building document control. All records were signed out by NRC team members and taken to the NRC Middletown office. Records review performed at Middletown. (Jim Tusar joined team on July 13, 1983).

Some system walkdowns were done-identified loop seal. At end of week, team orally identified for the licensee those records which were "missing" or not available and which were needed to perform a complete inspection. Licensee requested a written list - team refused.

July 18-22, 1983

Additional records review. (Peter Wen joined team) Discussion with licensee personnel. Set up Osborn computer - start calculations.

July 25-29, 1983

Records review. Discussion with licensee (Henry Shipman) identifying dates and conditions where NRC team thought water/hydrogen had been added. GPU ran some tests - NRC disagreed with test - subsequently, tests were run under direction and observation of NRC team.

During this week, NRC investigator was on site; he discussed sensitivity of the inspection with team leader.

August 1-5, 1983

Continue inspection at Middletown office. GPU, Parsippany representative assigned to leak rate test wanted to review some strip charts NRC had in Middletown.

During his visit (August 2?) to NRC office, the team orally discussed problem areas and repetitive dates with the GPU representative. No written material was provided and no records or charts which had NRC notations on them were given to GPU.

On August 4, Bettenhausen informed team leader Chung that there was to be no exit meeting and that team members should reduce their contact with licensee to the minimum necessary to keep data access.

August 8-12, 1983

August 8, team was directed not to conduct an exit interview. Exit interview scheduled for August 10 was cancelled. GPU protested. No findings, either in written or oral form, were presented to GPU or NRC.

Team leader terminated his inspection on August 10, one team member left August 11 and the remaining two members left on August 12.