

J. Santos

November 10, 1983

*my
amend*

Note to: H. Silver
From: R. Rawson
SUBJECT: TMI-1 STEAM GENERATOR REPAIR LICENSE AMENDMENT PACKAGE

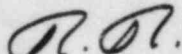
We have reviewed the TMI-1 steam generator repair license amendment package and have a number of comments. The most significant of these comments are summarized below; other comments of an editorial nature are marked on the attached copies of the amendment package. We are not withholding ELD concurrence on the basis of these comments. Our concurrence, however, is conditioned on the following: (1) appropriate revisions being made based on the comments enclosed herewith; and (2) ELD review and approval of the State Consultation section of the final determination (not a part of the present package).

Our principal comments are as follows:

1. Commission paper
 - a. The description of the amendment request in the Background section should be revised to clarify the two aspects of this amendment that are involved.
 - b. The Discussion section does little more than refer the reader back to the appropriate supporting documentation. We believe it would be prudent to give the Commission a brief discussion of the substance of and the basis for the action the Staff is recommending.
2. Letter to licensee -- no comments
3. Amendment
 - a. In 2.B.4, reference is made to Table 3.3-1 without specifying what document that table is a part of. This should be clarified.
4. Federal Register Notice
 - a. On page 2, the last sentence of the last full paragraph refers to "timely" comments in a way that leaves open whether untimely comments were also received and whether we have not addressed any such comments. This should be clarified or the reference eliminated.

- b. On page 3, the second full paragraph addresses 10 CFR 50.92 but fails to specify the criteria. A new second sentence should be inserted stating that "the Commission has concluded that the amendment (1) would not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) would not create the possibility of a new or different kind of accident from any accident previously evaluated; and (3) would not involve a significant reduction in a margin of safety."
- 5. Safety Evaluation Supplement -- minor comments as indicated
 - 6. Final Significant Hazards Consideration Determination
 - a. We need to review and approve the section on State Consultation.
 - b. In Section 3.1, Comment 2 response, it is not enough to refer the reader to NUREG-1019 and Topical Report 008 without specifying the section of at least the SER and summarizing the reference as you have for all other comments.
 - c. The response to Pennsylvania's first comment is not fully responsive in that it fails to address monitoring capabilities.
 - d. The response to Pennsylvania's second comment is not fully responsive in that it does not address whether the other leakage detection methods are "timely and sensitive."

Please call with any questions.


Richard J. Rawson

cc: J. Scinto
J. Gray