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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION '85 MAR 26 A8:52

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Before the Atomic Safety and Licensing Appeal Board H

In the Matter of)	
METROPOLITAN EDISON COMPANY) Docket No. 50-289 <i>SP</i>) (Steam Generator) Repair)
(Three Mile Island Nuclear) Station, Unit 1)	

NOTICE TO THE APPEAL BOARD

TMIA hereby provides this notification to the Appeal Board to highlight for the Board certain new information recently provided in the Staff's March 15 Board Notification (BN-85-028) which TMIA believes is relevant to its Appeal and Motion to Reopen the Record. Most of this information is referenced in Three Mile Island Alert's Formal Demand for Adjudicatory Hearing on Amendment to TMI-1 Operating License to Change Tube Plugging Criteria ("TMIA Demand for Hearing"). TMIA respectfully wishes to draw the Board's attention to the following:

1). The meeting summary accompanying BN-85-028 indicates that there is some question among NRC Staff representatives regarding the adequacy of Licensee's analysis in TDR-638, which accompanied Licensee's Answer to TMIA's Motic.. to Reopen the Record. TMIA Demand for Hearing at pars. 18-32. These views appear to undermine the Staff's position as expressed in the NRC Staff Response to TMIA Motion to Reopen the Record (January 24 1985) ("Staff Response"), particulary those sections where the Staff argues that TMIA's motion presents no significant safety concern.

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Staff Response at 7, 14. In light of Licensee's request for a change in its Technical Specifications regarding plugging limits, there is also some question as to the continuing validity of the Staff's view that safety can be assured because defective tubes will be removed from service. <u>Id</u>. As the Staff noted, the indications giving rise to TDR-638 and the request for revision of the plugging criteria are most probably within the upper tube sheet area as well, where kinetic expansion has occurred. Meeting Summary, at Tr. 37.

2). Staff representative Liaw strontly suggests that the Brookhaven analysis of crack propagation, Attachment 1 to the Staff's SER, NUREG-1019, is deficient and should not have been relied upon by the Staff. Meeting Summary at 48-49.

> Respectfully submitted, THREE MILE ISLAND ALERT, INC.

Joanne Doroshow Louise Bradford

Dated: March 25, 1985