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COMMISSIONER

January 25, 1985

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MEMO TO: William L. Clements, Chief  
Docketing and Service Branch

FROM: Patricia R. Davis, Legal Assistant  
Office of Commissioner Asselstine

SUBJECT: TMI-1 Steam Generator Proceeding

SERVED JAN 28 1985

Please serve the attached letter on the parties to the TMI-1 Steam Generator proceeding.

cc: Chairman Palladino  
Commissioner Roberts  
Commissioner Bernthal  
Commissioner Zech  
OGC

DS02

TO:

January 20, 1985

COMMISSIONER JAMES ASSELSTINE  
UNITED STATES NUCLEAR REGULATORY COMMISSION  
1717 H STREET  
WASHINGTON, D D 20555

Dear Commissioner Asselstine;

I received a copy of Jane Lee's letter written 11/30/84, regarding her concerns about GPU Nuclear's then recent statements regarding plans and/or negotiations to purchase new steam generators for Three Mile Island's Unit 1. I've also received, and read over GPU's president P. R. Clark's response to that letter. I thought it important to forward to you my own account of matters relating to those brought up in Ms. Lee's letter, and concerns about any potential purchase of new steam generators, or parts to construct the same for TMI's Unit#1.

I was following up on some environmental "situations" in this area, found myself checking out contaminants released in effluents to the Susquehanna River, and into groundwater on the island. This involved alot of questions on my part, and so, during a phone call, Ralph Di Santis, from the plant's Press Relations Office, invited me to meet with persons who would better be able to answer some of my questions.

On November 28, 1984, I met with Mr. Di Santis, Dr. Gary Baker, Manager of TMI's Remp Program, and Steve Williams, a radiological engineer in TMI Unit 1.

Various subjects were covered at the meeting. At the end of it, I did ask about GPU's possible purchase of new steam generators for Unit 1. I had heard that GPU had stated that it was negotiating for new steam generators at a public meeting in Conewago. When I raised the new generators question, I, therefore, specifically asked if the accounts I had heard of the Conewago Meeting were correct, i.e. that GPU was getting new generators for #1. Dr. Baker, and Mr. Williams both replied in the affirmative. Mr.

Williams went on to say that GPU was negotiating with "an out of state compnay" for new steam generators. He then added this did not mean GPU felt there was anything wrong with Unit 1's generators. The new generators were simply insurnce, since, "on down the road" the old generators would have to be replaced. Questioned why this was the case, as nearly as I can recall, Mr. Williams replied that once a certain number of generator tubes had to be plugged, Tech Specs required the aquisition of new generators, or rather their installation.

( I should add that Mr. Williams mentioned that the generators would probably be installed the first time Unit 1 was shut down for refueling purposes.)

I asked how the Tech. Specs. required the steam generators' being replaced. It was explained that with a certain number of plugs in the tubes being exceeded, the heat transfer would be affected negatively. The generating capacity of the plant would be reduced to a level at which it would not be economically feasible to run the plant. It was stressed that the problems created by the surplus of plugs, were economic ones, and not those of health and safety. (I assume that somewhere there must be regulations, or requirements about a plant's capacity to generate electricity, but know nothing about that area of econmic concerns.)

That was the sum of my conversations involving the possible purchase of new steam generators; however, I did follow up on the subject with a call to the P.R. Office asking from what concern GPU planned to buy the generators, and whether they were "used" ones, i.e. constructed for another plant. A week or so later Mr. Di Santis called me back. He told me the company was negotiating with Toledo-Edison, but that they were only negotiating to buy parts. I asked what parts they planned to buy, and Mr. Di Santis said he did not know. I did not pursue the matter further with Mr. Di Santis, nor with GPU otherwise. I did call various people here to check out what the Tech. Specs. might say about plugging limits on the steam tubes.

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I feel some very contradictory statements have been made regarding the possible acquisition of new steam generators for Three Mile Island's Unit 1. And feel that enough statements were made here to indicate there were plans or negotiations in progress to acquire new generators. One person to whom I spoke mentioned that there were not that many parts to the generators to begin with....so I must deduct that if that statement was correct, acquiring parts would almost be the same as acquiring whole new generators.

I am also concerned that should the plant restart, the generators now in place would simply be inadequately patched excuses for generators that are planned for a future refueling. It is a relief to public health and safety worries that I have regarding this matter, to speculate with some certainty, that refueling would probably come sooner than projected, thus preventing further use of the overplugged tubes. (Should new generators then be installed). It is my understanding that it would be both difficult, if not impossible, to put new generators into TMI 1, and would be an unsafe procedure as well.

I noted that Mr. Clark stated that this generator replacement had been done at several plants already? Where were the plants? And were the replacements done with NRC approval? Or knowledge, if approval was not required for such a procedure. And I am wondering if Mr. Clark's statement about generator replacements in other plants, indicate this might be, or indeed has been planned for TMI 1?

And whether or not those replacements might become standard procedure in operating nuclear plants in the future, although I hope not, the consideration of new generators for TMI 1 at this particular time, and with that particular plant, must raise concerns about its being able to be operated safely.

Also I feel the contradictory statements would not have been made, if there were no questions to be raised about the reports of negotiations for generator replacements.

Sincerely,

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