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TAC No. 66355

May 11, 1988

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating Licensing No. DPR-50
Docket No. 50-289
Clarification of NRC Safety Evaluation Report (SER)
Concerning Relief from ASME Section XI
Inservice Inspection Requirements

GPUN has reviewed the NRC's SER, dated March 25, 1988 granting the relief necessary to perform surface examinations in lieu of volumetric examinations on certain pipe branch connection welds in the Main Steam and Decay Heat Removal systems. Although it appears that relief has been granted as requested, we would like to clarify the statement of our request as stated in the SER in order to avoid any misinterpretations.

It should be understood that GPUN has only adopted later code versions for their examination method techniques and acceptance criteria and that all other requirements (e.g., selection criteria and frequency of examination) will be in accordance with the 1974 Edition through Summer 1975 Addenda of the Section XI Code. Later editions of the ASME Code were used as a basis for justification of our relief request and it was not our intent to adopt the later edition of the code or increase the scope of the selection criteria beyond that required by the 1974 Edition through Summer 1975 Addenda.

The examinations involved in our request will be performed in accordance with the selection criteria and frequency of examination specified by IWC-2411 and IWC-2520 of Section XI, 1974 Edition with Addenda through Summer 1975. It should be noted that even though there are 30 welds involved, the 1974 Code (and later codes as well) require that only a small percentage of the welds be examined.

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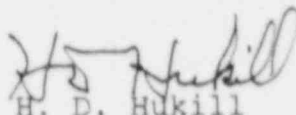
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We feel that this information does not represent a change from our request as discussed with the NRC in several conference calls and as documented in our letters of August 20, 1986, October 20, 1986, and August 31, 1987. Therefore, we trust that the NRC's SER is based upon a clear understanding of our request.

Sincerely,



H. D. Hukill
Vice President and Director, TMI-1

HDH/MRK

cc: J. Stolz
R. Hernan
R. Conte
W. Russell