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U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Asymmetric LOCA Loads/Leak Before Break Analysis  
(TAC 65003)

The purpose of this letter is to document our understanding of your letter dated November 5, 1987, which forwarded the NRC Safety Evaluation relating to the elimination of dynamic effects of postulated primary loop pipe ruptures from the design basis of TMI-1.

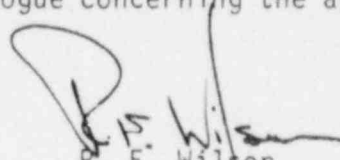
It is our understanding that your letter and safety evaluation of November 5, 1987, conclude that GPUN has provided sufficient analyses and controls to adequately demonstrate that the the TMI-1 primary loop piping complies with GDC-4 of 10 CFR 50 Appendix A and, as such, the dynamic effects of postulated primary loop piping ruptures may be eliminated from the TMI-1 design basis. These analyses and controls were contained in our submittals of March 20, 1987 (5211-87-2071) and August 21, 1987 (5211-87-2163). GPUN considers that all NRC staff requirements have been fully satisfied by these submittals.

As a point of technical clarification, GPUN believes that TMI-1 is not limited nor restricted by the use of the material "JM" in its current or near term future Leak Before Break (LBB) evaluations. GPUN does not believe that the use of JM was inappropriate and, as such, will continue to rely on the analysis which uses JM, as specified in our submittals, to demonstrate compliance with the revised GDC-4 of 10 CFR 50 Appendix A. GPUN recognizes that the staff's independent analysis to verify our results used the more conservative material "JD". It is noted that both GPUN and NRC analyses

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reached the same conclusion; that by using the approach defined in Volume 3 of NUREG 1061, it is justifiable to eliminate the dynamic effects of postulated primary loop piping ruptures from the TMI-1 design basis. GPUN will continue to participate in industry and professional activities (such as ASME Code Committees) to monitor the ongoing dialogue concerning the appropriate use of material  $J_M$  versus material  $J_D$ .



R. F. Wilson  
Vice President and  
Director, Technical Functions

RFW/JA:fg

cc: T. Murley  
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