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November 15, 1988
C311-88-2138

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

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Clarification of GPUN Response to IE Bulletin 82-02

The purpose of this letter is clarify GPUN's commitment for inspection of reactor coolant pressure boundary (RCPB) fasteners that are reused following removal.

IE Bulletin 82-02, entitled "Degradation of Threaded Fasteners in the Reactor Coolant Pressure Boundary of PWR Plants" concerned Stress-Corrosion Cracking (SCC) and boric acid wastage of threaded fasteners for closure connections. The bulletin requested, among other things, that inspections be performed during the following refueling outage that began 60 days after the date of the bulletin. Threaded fasteners of closure connections, identified in the scope of the bulletin, when opened for component inspection or maintenance were to be removed, cleaned, and inspected per Paragraphs IWA-2210 and IWA-2220 of the ASME Code Section XI (1974 edition or later) before being reused. A report was required to be submitted 60 days following completion of the outage during which these inspections were performed. The report was to identify the specific connections examined as required by the bulletin (Item 2) and provide the results of the examinations performed.

GPUN's response dated December 5, 1985 (5211-85-2198) provided the requested information. Our response did not however provide a clear statement of our commitment for future examinations of RCPB fasteners prior to reuse following inspections or maintenance.

GPUN intends to perform Visual Examinations (VT) on all RCPB fasteners prior to reuse. Magnetic Particle (MT) or Penetrant Examinations (PT) will also be performed unless: 1) the RCPB fastener has only experienced short term service (≤ 3 months)

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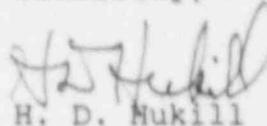
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since its last MT or PT and 2) the fastener was found dry and without evidence of boric acid crystals or rust.

This exception could potentially save a significant amount of critical path time and some personnel exposure during unplanned outages that occur within three months of the beginning of a cycle. Such an exception is justified in that 3 months of operation is a relatively insignificant period of service for fasteners which have recently passed the MT or PT examination and SCC or boric acid wastage is unlikely where the fastener was found dry with no evidence of leakage or moisture.

Sincerely,



H. D. Mukill

Vice President and Director, TMI-1

HDH/MRK

cc: J. Stolz
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