



GPU Nuclear Corporation  
One Upper Pond Road  
Parsippany, New Jersey 07054  
201-316-7000  
TELEX 136-482  
Writer's Direct Dial Number:

C311-90-2052

April 26, 1990

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

Dear Sir:

Three Mile Island Nuclear Generating Station, Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Comments on Risk-Based Inspection Guide for Three Mile Island, Unit 1

NRC letter dated February 9, 1990 (C311-90-3033) transmitted a draft Risk Based Inspection Guide for TMI-1 (NUREG/CR-5488, November 1989) and requested GPUN technical comments or suggestions on the draft.

Enclosed is a tabulation of CPUN comments on the draft Risk Inspection Guide (RIG). We understand the RIG will be finalized with any necessary corrections and issued for use at TMI-1.

Sincerely,

H. D. Hukill

Vice President and Director, TMI-1

HDH/DJD/lt  
Enclosure

cc: J. Stolz, USNRC  
R. Hernan, USNRC  
T. Martin, USNRC, Region I  
F. Young, USNRC, TMI-1

9005040053 900426  
PDR ADDCK 05000289  
Q PDC

31010890

*Acc  
4/11*

ENCLOSURE

GPUN Comments On Draft Risk Inspection Guide (NUREG/CR-5488, November 1989)

1. Page 5.3, operator action #7: revise words "for injection" to "for RCP seal injection", for proper clarification.
2. Figure A1.1, page A.7: revise valve tag nos. "MU-V-7A, MU-V-7B" to "DH-V-7A, DH-V-7B", respectively.
3. The following valve positions on various Figures should be revised as noted below to denote normal valve lineups:

<u>Figure</u>	<u>Change</u>	<u>From</u>	<u>To</u>
A1.1	DH-V-4A	Open	Closed
A1.1	DH-V-4B	Open	Closed
A2.1	MU-V-69A	Open	Closed
A2.1	MU-V-69B	Open	Closed
A5.2	Complete lineup shows system isolated and shutdown which is not the normal condition.*		
A6.1	All valves are shown open which is not the normal condition.*		
A7.1	EF-V-30 A,B,C,D	Open	Closed
A7.1	EF-V-8 A,B,C	Closed	Open
A7.2	System has been modified.*		
A10.1	System has been modified.*		
A14.1	BS-V-3A	Open	Closed
A14.1	BS-V-3B	Open	Closed
A14.1	The lines labeled "From Sodium Hydroxide Tank" are actually from the deleted Sodium Thiosulfate Tank. Revise wording "From Sodium Hydroxide Tank" to "From Deleted Sodium Thiosulfate Tank".		

Note:\*Reference latest FSAR Figure for correct valve lineups or latest system configuration.

4. Page A.10, Item 13: delete the words "in series". The check valves referred to are not all in series in one single flow path.
5. Figure A3.1: change "DC-V-5A" to "DC-V-65A".
6. Page A.47, Item 7: The failure mode for the listed valves should be revised from "failure to open" to "failure to remain open".
7. Page B.8, Table A9-1, Item 7: Revise failure mode description from "Failure of Motor-Operated Valves to open" to "Failure of Motor-Operated Valves to Remain Open".
8. Page D.2, Table D-1: Either delete "X" for Instrument Air to Reactor Building Isolation, or add a note to clarify that instrument air loss does not cause failure of the Reactor Building to isolate.

9. Page A.1, Section A.1: Delete the word "training" from codes PC, PT, and MT. Inspection activities should focus on procedures and actual performance of maintenance activities. Training may be evaluated if a job deficiency is observed in the field, but training should not be a primary inspection activity. This is consistent with Page B.1, Sections B.2 and B.3 which do not include any reference to training.
10. Page A.59, Table A12-1, Item 2: Delete the code "OP" from this item since this is not an operator task.
11. Page A.64, Table A13-1, Item 1&2: Delete the codes "(MT,PT, OP)" from both activities, Reactor Building Purge and Sump Draining, since no specific failure mode is assumed.
12. Page B.3, Table B1: Delete "ESAS Sensors Calibration Table A12-1, Item 2" since this is not an operator task. Delete "Reactor Building Purge in Progress Table A13-1, Item 1" since this is not a human error as described in the heading. Delete "Sump Draining in Progress Table A13-1, Item 2" since this is not a human error as described in the heading.
13. Page 2.1, Last sentence of paragraph #2: Delete the following sentence: "These revisions to the PRA have not yet been performed." Substitute the following sentence: "GPUN has revised the PRA model as reported in a letter dated March 17, 1989, but the PRA report will not be revised until completion of the IPE."
14. Page 2.3, Section 2.1.2, Description of the Loss of River Water Scenario should also identify that an RCP seal LOCA could occur due to the loss of seal injection flow and loss of thermal barrier cooling.