

M. I. LEWIS  
6504 BRADFORD TERR.  
PHILA., PA. 19149

5/1/82.

54-289

Office of Nuclear Reactor Regulation  
Attention: D.G. Eisenhut, Director  
Division of Licensing  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Sir:

By this letter, I wish to voice my opposition to Mr H.D. HuKill's request of April 30, 1982 that there be no hearings on the OTSG tubing problem.

There should and must be hearings on the OTSG problem at TMH1. This is a very special instance of admitted management incompetence-admitted by the very management in question.

Due to a management error, thiosulphate was supposedly released into the wrong system, and this release eventually lead to OTSG tubing failure. There is no reason to believe that the management has improved, and this type of error will not continue unabated. Surely we need hearings to determine that management has improved or at least won't make the same mistake again.

Further there is really no absolute nor even physical proof that the thiosulphate addition was the real culprit in the tubing failure. As GPUNC has admitted, these ions are present due to other possibilities and there is no reason to exclude other possibilities for the presence of sulfur and chlorine. Therefore, even if the tubing failure is related to the presence of sulfur and chlorine compounds, there is no reason to exclude other sources for the chlorine and sulfur attack. There is no physical proof that the sulfur and chloride came from the inadvertent thiosulphate addition exclusively or totally. Therefore if the tubing failure was related to the presence of chloride and sulfur, there is still no reason to believe that the "prima causae" was exclusively or partially related to the inadvertent addition of thiosulphate.

The only thing that the inadvertent addition of thiosulfate proves is that the GPUNC management was incompetent to avoid the inadvertent addition of thiosulphate.

Also the tubing was "sensitized." How extensive and dangerous is this sensitization? Will new heat treatments really eliminate or control this sensitization? Are any other structures "sensitized?" What is the rationale for changing the heat treatments and has the changed heat treatments worked in the past?

There are many, many other questions that bear answering before the so-called undamaged reactor can be restarted. The relationship of PTS and tubing failure is just one that is not discussed in the GPUNC submissions. I hope that this letter will get speedy and informed attention.

Very truly yours,

*M. I. Lewis*

M. I. LEWIS  
6504 BRADFORD TERR.  
PHILA., PA. 19149

8309270184 830629  
PDR FOIA  
DOROSH083-243 PDR

215 CU 9 5964  
215 725 7825  
215 326 9122

*ECLEWIS*