



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
Post Office Box 2063  
Harrisburg, Pennsylvania 17120

June 30, 1983

717-787-2480

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Gentlemen:



The Commonwealth of Pennsylvania appreciates the opportunity to comment on the NRC Staff's preliminary finding of no significant safety hazard on a request for an amendment to the license for TMI-1 submitted by GPU Nuclear and as noticed in the Federal Register dated May 31, 1983.

The Federal Register notice identifies two separate items that need to be decided by the NRC -- the pending technical specification change request, and the approval of the steam generator ("OTSG") repair. The OTSG repair and reuse approval is a separate issue from the technical specification change request and is obviously much more complex. Because of the difference in importance and complexity between the two issues, it is necessary to separate the decision making process into two distinct steps, both of which would be subject to the State consultation process.

As you are aware, the NRC Staff is required to make a good faith effort to consult with the Commonwealth on its finding of no significant safety hazard. It is our opinion that the consultation process should always include the opportunity to review the Staff's safety evaluation report ("SER") and discuss the report or reports for the Licensee's proposed amendments. We therefore request that the safety evaluation reports for these amendments be provided for our review prior to a final decision on safety hazards consideration, to ensure that all of our concerns have been fully identified and satisfied. In addition, the results of any preliminary leakage tests which have been conducted should be presented and evaluated to provide additional assurances that the repairs have been satisfactory. Only if this opportunity for full review of the safety evaluations is offered can we be assured that the repaired OTSGs can be reused without posing a significant safety hazard and that a hearing on repair and reuse of the OTSGs is not necessary.

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Although we cannot make a determination on the absence of significant safety hazards without copies of the SERs, the Commonwealth has been reviewing the various safety evaluations that have been submitted by GPU Nuclear Corporation to the NRC for the OTSG repair and subsequent reuse. We have also requested additional information from GPU Nuclear on issues that are of particular concern to us, such as additional details on all possible release paths and methods for detecting increased OTSG tube leakage and operator response to that leakage.

In conclusion, this amendment and all future amendments for facilities in Pennsylvania should include the opportunity to review the NRC safety evaluation reports as a necessary step in a good faith consultation process. We await receipt of these reports from the NRC before making any conclusion on the existence of a safety hazard in connection with the two pending amendments.

Sincerely,

*Thomas M. Gerusky*

Thomas M. Gerusky, Director  
Bureau of Radiation Protection