

I understand there was a final outer ring which could not be repaired at all. I understand that no-one is claiming the leaks are stopped, only slowed. I understand the original leak tolerance has been increased since the repairs were done. None of these things reassure me that this is a routine procedure or a routine request. The fact that 2/3 of the tubes in the steam generator were repaired would seem in itself to dictate a hearing. When were 2/3 of a reactor's steam generator tubes ever repaired at once before?

I must come back to using common sense again. I understand that expanding the tubes smooths out grooves of some kind manufactured into the tube. Haven't those grooves provided a measure of expansion which will no longer be there when the pipe is stressed once more?

I believe there is no welding, no soldering, not even any Elmer's glue applied to either end of the repair. In aircraft I am told that a somewhat similar "sleeving" of two metal tubes has proven unsuccessful as soon as any vibration develops. Vibration will shear off the original tube just above the "sleeve." Certainly there is some vibration under normal operation. In times like the Unit 2 accident, operators reported tremendous vibration-so great they had to shut the thing down.

These pipes did not just have a couple little holes or cracks. According to an NRC staff briefing, when the leaks were discovered, they were so bad it was impossible to get over two pounds of pressure in the vessel. On the second test they were able to get up to 15 lbs. but no more. You started with a big problem. Even the most tested reliable procedure should have had scrutiny with that big a job.

According to the proposal submitted by GPU the repairs create a new tube to tubesheet joint and remove the degraded portion from the primary system pressure boundary. Again, common sense tells me that this has to create new operating conditions for this system. Testing the results with a computer model or a miniature mockup hardly seems enough to "prove" that this altered system will work. It certainly does not seem to qualify for the definition of "no changes" in the steam generator.

Frankly, I am not sure I trust GPU's safety evaluation. A company which encourages falsifying leak rates and cheating on operator exams to keep the plant running does not seem to me to be above falsifying a few tests as well. Who has evaluated the system and the qualifying tests besides GPU? And who has seen any of the evaluations? We were told that the reports were classified because they were proprietary information. Is the public being asked once more simply to trust GPU?

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B. Davis

I question GPU's sincerity in claiming No Significant Hazard when they filed both for a Class I license amendment (\$1,200 fee) and for a Class IV (\$12,300 fee) simultaneously. I am leery as well of their desire to rush the amendment through by asking the NRC to "Please act by June 15." In addition they asked the NRC to combine the conditions for license with the publishing of request for amendment.

In all of the request for amendment there is no mention of any compensatory measures to be taken for the operation of a steam generator with 2/3 of its tubes repaired. Only one sentence even hints that GPU might have to run the plant at less power or some other restriction. "The Commission, however, proposes to determine that the application does not involve a significant hazards consideration because compensatory measures will be employed to provide a level of safety in operation with the repaired steam generators commensurate with that anticipated of the facility had it not experienced the need to repair steam generators."

By all the standards I have mentioned this does pose a Significant Hazard. It does require a public hearing. The facility is changed, significantly. It is changed dangerously with a bargain basement repair that is calculated to get the plant back into the rate base, not to allow it to operate safely in a manner which will protect the health and safety of the people who work in the plant and those who simply live in the area.

Your own staff has predicted more steam generator accidents will happen. You cannot afford to be casual about Unit 1 being the next accident to happen.

Yours truly,

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