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UNION OF CONCERNED SCIENTISTS

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May 6, 1985

Nunzio J. Palladino, Chairman
Thomas M. Roberts, Commissioner
James K. Asselstine, Commissioner
Frederick M. Bernthal, Commissioner
Lando W. Zech, Commissioner
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

OFFICE OF SECRETARY
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Gentlemen:

Please note that Philip Clark's letter to you of April 26, 1985 (received by UCS on May 2), regarding the assumptions postulated by UCS for an analysis of a design basis steam generator tube rupture accident at TMI-1, is incorrect. The correct assumptions are contained on page 5 of the handout UCS gave you on April 18, 1985, and explained in my letter to Mr. Baxter, counsel for GPU, dated April 26, 1985. Copies of handout page 5 and my letter are attached.

Mr. Clark has misinterpreted assumption #1 and then attributed his misinterpretation to UCS. Assumption #1, which is fully consistent with the Standard Review Plan as spelled out in my April 26, 1985 letter, is that the plant is operating with that equipment required to be operable for unrestricted operation, as dictated by the TMI-1 technical specifications. Contrary to Mr. Clark's assertion, this assumption would not call for postulating simultaneous loss of offsite power and unavailability of both diesel generators. Technical specification 3.7 for TMI-1 requires both diesels to be operable for unrestricted operation. Therefore, a single failure would involve the loss of at most one diesel. By contrast, technical specification 3.1.13 permits unrestricted operation with the high point vent in loop A inoperable. A single failure could disable the three remaining high point vents because they share a common power supply.

Please note that the attachment to Mr. Clark's letter purports to be a list of UCS assumptions. In all cases except assumption #1, it is a direct quote from page 5 of our April 18 handout to you. In the case of assumption #1, by contrast, parenthetical language has been added which is not contained in our handout, which is not accurate, and which was not contained in any conversation I had with Mr. Baxter.

When I received Mr. Clark's letter, I offered to have Mr. Pollard explain the difference to Mr. Baxter or directly to GPU's technical people. Mr. Baxter declined both suggestions.

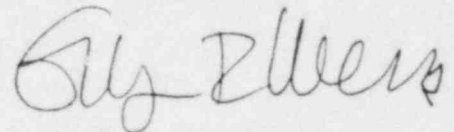
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In any case, Mr. Clark has apparently provided the information Chairman Palladino requested by stating that an analysis of a steam generator tube rupture for TMI-1, in accordance with the NRC Standard Review Plan, would require four to six months. This in itself suggests that the generic B&W report referred to does not fulfill the need here.

We urge you to quickly direct that an analysis in accord with the Standard Review Plan be done for TMI-1. It is apparent that GPU will not otherwise perform one. It is questionable that such an analysis would show that public health and safety are adequately protected in the event of a design basis steam generator tube rupture accident at TMI-1.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Ellyn R. Weiss".

Ellyn R. Weiss
General Counsel

encl: As Stated

cc w/o encl: TMI-1 Service List

SAFETY EVALUATION OF TUBE RUPTURE ACCIDENT AND REASSESSMENT
OF TRAINING AND EMERGENCY PROCEDURES ARE NECESSARY TO ASSURE SAFETY

- NRC STAFF ACKNOWLEDGED THAT UCS IS CORRECT: A SAFETY EVALUATION OF A STEAM GENERATOR TUBE RUPTURE ACCIDENT AT TMI-1 HAS NOT BEEN PERFORMED IN ACCORDANCE WITH THE COMMISSION'S SAFETY REQUIREMENTS FOR DESIGN BASIS ACCIDENTS
- A SAFETY EVALUATION SHOULD BE PERFORMED AND SHOULD HAVE FOLLOWING FEATURES:
 1. ASSUME PLANT OPERATION IN ACCORDANCE WITH TECHNICAL SPECIFICATIONS, I.E., SOME SAFETY EQUIPMENT INOPERABLE
 2. TUBE RUPTURE ACCIDENT OCCURS
 3. ASSUME LOSS OF OFFSITE ELECTRICAL POWER
 4. ASSUME SINGLE FAILURE
 5. EVALUATE WHETHER CORE DAMAGE AND OFFSITE RADIATION DOSES WITHIN REGULATORY LIMITS RELYING ONLY ON REMAINING SAFETY-GRADE EQUIPMENT
- IF SAFETY EVALUATION SHOWS THEORETICALLY ACCEPTABLE CONSEQUENCES, REASSESS TRAINING AND EMERGENCY PROCEDURES TO JUDGE WHETHER THERE IS REASONABLE ASSURANCE THAT THE SAFETY EVALUATION'S ASSUMPTIONS REGARDING OPERATOR ACTIONS ARE VALID

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April 26, 1985

Thomas A. Baxter, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036

Dear Mr. Baxter:

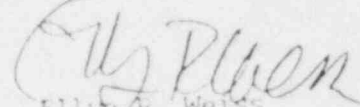
You called me earlier this week in response to Chairman Palladino's suggestion to Mr. Clark that GPU ascertain what UCS believes is necessary for a safety evaluation of the design basis steam generator tube rupture accident for TMI-1. In particular, you asked if page five of the hand-out which UCS gave to the Commission on April 18, 1985, constituted our view of what such a safety evaluation would consist of and I answered in the affirmative. That page contains a simplified description of the process described in the Standard Review Plan for analysis of the steam generator tube rupture accident.

I think that the only part of page five of the handout that may need clarification is item number 1: "Assume plant operation in accordance with technical specifications, i.e., some safety equipment inoperable." What is meant is that the analysis should assume the availability of only that safety equipment which is required to be operable under the TMI-1 license for unrestricted operation of the plant, i.e., only that safety equipment necessary to satisfy the limiting conditions for operation. The single failure criterion would then be applied. In other words, the beginning assumption is that only safety equipment required to be operable is operable and a single random failure (in addition to the tube rupture) is then postulated.

GPU might also wish to give some thought to whether, given the current condition of the TMI-1 steam generators, the design basis accident for TMI-1 should go beyond the single-tube rupture applicable to all other plants and include postulating multiple tube ruptures. Note that GPU technical data report for the revised TMI-1 tube rupture procedures states: "Since extensive circumferential cracking was discovered in approximately 1200 of the 31,000 tubes, it became clear that a revised set of procedures for dealing with both single and multiple SGTRs should be developed." TLR-406, Rev. 3, p. 14, emphasis added.

In sum, the Standard Review Plan establishes a procedure for evaluating a design-basis steam generator tube rupture accident. Such an evaluation has not been done for TMI-1 and UCS believes it should be.

Very truly yours,


Elyse R. Weiss
General Counsel

cc: TMI-1 Service List