

JUL 15 1985

Ms. Ellyn R. Weiss
Union of Concerned Scientists
1346 Connecticut Avenue N. W.
Suite 1101
Washington, D. C. 20036

50-249

Dear Ms. Weiss:

The Commissioners have requested that I respond to your letter of April 18, 1985 concerning comments made by Mr. Clark of GPU Nuclear Corporation to the April 18, 1985 Commission meeting.

You challenged the validity of the statements made by Mr. Clark at the April 18 meeting which denied that the changes to the steam generator tube rupture procedures were made to account for the problems encountered in the steam generator tubes at TMI-1. You cited statements taken from pages 14 and 15 of the GPU Technical Data Report (TDR) 406 Rev. 3 to support a view that contrary to Mr. Clark's statements, there was a connection between the revised procedures and the steam generator tube problems at TMI-1. You further noted, that Mr. Clark was on distribution for the GPU TDR 406 and should have been knowledgeable about the document.

The primary sentence in TDR 406 which appears to contradict Mr. Clark's statements is as follows:

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 [steam generator tube ruptures] should be developed.

From one perspective, this one sentence from the TDR is not wholly consistent with the statements made by Mr. Clark at the Commission meeting. However, the sentence could also be read as merely saying that GPU should be prepared for the possibility of a tube rupture accident because one could happen. The TDR as a whole focuses on ways to improve procedures to handle tube rupture accidents; it does not promote reliance on such procedures to "accommodate" or "compensate for" degradation of the steam generators.

Mr. Clark's statements in question involve his responses to similar questions posed by different Commissioners during the course of his presentation at the April 18th Commission meeting on the TMI-1 steam generators. The Commissioners' questions were aimed at probing whether, as you allege, changes were made in plant operating procedures in order to account for the degraded condition of the TMI-1 steam generators. Mr. Clark denied that the changes were proposed for that reason, explaining, for example in response to Commissioner Zech:

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PDR ADOCK 05000289
P PDR

We believe that the procedures we now have approved for TMI-1 are the proper procedures to use for the plant. That they provide greater protection of the public health and safety, and that they should be adopted regardless of steam generator condition. And in fact in many cases -- and I hesitate to say "all" because we have not gone back and looked -- we were looking at those changes in the procedures before the steam generator problem was even known....

They are not developed in order to accomodate [sic] any concern about the steam generator. They are developed for other good and sufficient reasons independent of that.

This response can be found from a transcript of the meeting at 93. Other applicable responses from Mr. Clark can be found in the same Transcript at 68-69, 72, 78-79, 101, and 108-109.

From our viewpoint, the TMI-1 steam generators have been returned to their original licensing basis and meet applicable requirements; and therefore the improved procedures are not necessary to account for any alleged degradation of the steam generators. We believe that the TMI-1 procedures are prudent procedures. In this regard, it is worth noting that, regardless of whether there is a history of steam generator tube degradation, a steam generator tube rupture (SGTR) is a design basis accident for which we expect a licensee to be prepared to respond. Both the NRC and industry have had under consideration improvements in responding to such accidents so as to minimize their consequences; and new Babcock & Wilcox SGTR guidelines for other plants are similar to those at TMI-1 in many respects. Our interest in the emergency procedures for handling a tube rupture at TMI-1 was based primarily on the results of our review of the 1982 tube rupture event at the Ginna plant. (Refer to NUREG-0909 and NUREG-0916 for further details). In fact, as a result of knowledge gained by the Ginna event we asked GPU Nuclear to review its procedures for dealing with a tube rupture accident. GPU Nuclear indicated that it was considering revisions to the procedure (Mr. Clark indicated at the Commission meeting that some changes were under consideration as early as 1979). As described in our safety evaluation, NUREG-1019, we consider the present TMI-1 procedures to be an improvement over the earlier procedures. Nonetheless, the staff could accept the earlier procedures as adequate.

Thus, notwithstanding the single anomalous statement in the TDR, we do not conclude that Mr. Clark's statements to the Commission were false or misleading.

Sincerely,

Original signed by
Darrell G. Eisenhower

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

ORB#4:DL
JHoma;cr
6/26/85

ORB#4:DL
JSH:12
6/27/85

OELD
H. Denton
6/27/85

ADLOR:DL
GLainas
6/27/85

D:DL
HThompson
7/1/85

DD:DL
DEisenhut
7/1/85

D:DDR
HDenton
7/1/85

Per HT
ED determined
no false statements
+ no need to inform
etc

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Office of Nuclear Reactor Regulation

ORB#4:DL
JKH:cr
6/2/85

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JSE:12
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OE:DL
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

EDO PRINCIPAL CORRESPONDENCE CONTROL

FROM:

SAMUEL J. CHILK
SECY

DUE: 06/21/85

7/8/85

EDO CONTROL: 000702

DOC DT: 06/07/85

FINAL REPLY:

TO:

DIRCKS

FOR SIGNATURE OF:

** GREEN **

SECY NO:

DENTON

DESC:

REQUEST STAFF PREPARE APPROPRIATE RESPONSE TO
4/18/85 LETTER FROM ELLYN WEISS, UCS RE TMI-1
STEAM GENERATOR TUBE RUPTURE

DATE: 06/10/85

ASSIGNED TO: NRR

CONTACT: DENTON

ROUTING:

DIRCKS ✓
ROE ✓
REHM ✓
STELLO ✓
GCUNNINGHAM ✓
TAYLOR
MURLEY ✓

SPECIAL INSTRUCTIONS OR REMARKS:

NRR RECEIVED: 06/10/85

ACTION: DL, H. THOMPSON

G. Lamas

ROUTING: DENTON/EISENHUT
PPAS