



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 23, 1996

Mr. James Knubel
Vice President and Director - TMI
GPU Nuclear Corporation
Post Office Box 480
Middletown, PA 17057-0480

SUBJECT: CLOSEOUT FOR GPU RESPONSE TO GENERIC LETTER 92-01, REVISION 1,
SUPPLEMENT 1 FOR THREE MILE ISLAND UNIT 1, (TAC NO. M92741)

Dear Mr. Knubel:

On May 19, 1995, the NRC issued Generic Letter 92-01, Revision 1, Supplement 1 (GL 92-01, Rev. 1, Supp. 1), "Reactor Vessel Structural Integrity." In GL 92-01, Rev. 1, Supp. 1, the NRC requested that nuclear licensees perform a review of their reactor pressure vessel structural integrity assessments in order "to identify, collect, and report any new data pertinent to [the] analysis of [the] structural integrity of their reactor pressure vessels (RPVs) and to assess the impact of that data on their RPV integrity analyses relative to the requirements of Section 50.60 of Title 10 of the *Code of Federal Regulations* (10 CFR 50.60), 10 CFR 50.61, Appendices G and H to 10 CFR Part 50 (which encompass pressurized thermal shock (PTS) and upper shelf energy (USE) evaluations), and any potential impact on low temperature overpressure (LTOP) limits or pressure-temperature (P-T) limits."

More specifically, in GL 92-01, Rev. 1, Supp. 1, the NRC requested that addressees provide the following information in their responses:

- (1) a description of those actions taken or planned to locate all data relevant to the determination of RPV integrity, or an explanation of why the existing data base is considered complete as previously submitted;
- (2) an assessment of any change in best-estimate chemistry based on consideration of all relevant data;
- (3) a determination of the need for the use of the ratio procedure in accordance with the established Position 2.1 of Regulatory Guide 1.99, Revision 2, for those licensees that use surveillance data to provide a basis for the RPV integrity evaluation; and
- (4) a written report providing any newly acquired data as specified above and (1) the results of any necessary revisions to the evaluations of RPV integrity in accordance with the requirements of 10 CFR 50.60, 10 CFR 50.61, Appendices G and H to 10 CFR Part 50, and any potential impact of the LTOP and P-T limits in the technical specifications, or (2) a certification that previously submitted evaluations remain valid.

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Revised evaluations and certifications were to include consideration of Position 2.1 of Regulatory Guide 1.99, Revision 2, as applicable, and any new data. The information in Reporting Item (1) was to be submitted within 90 days of the issuance of the GL. The information in Reporting Items (2) — (4) was to be submitted within 6 months of the issuance of the GL.

The staff has noted that GPU submitted the information requested in Reporting Item (1) on August 16, 1995, and requested in Reporting Items (2) — (4) on November 20, 1995. Since GPU has submitted the requested information and has indicated that the previously submitted evaluations remain valid, the staff considers the RPV integrity data for the Three Mile Island, Unit 1 to be complete at this time and have closed TAC No. M92741

The staff has noted that the most recent reactor vessel integrity assessment for the Three Mile Island, Unit 1 is covered by the scope of Babcock and Wilcox (B&W) Topical Evaluation BAW-2257, Revision 1. This topical report was the subject of an April 30, 1996 meeting between the staff and representatives of the Babcock and Wilcox Owners Group (BWO). The topical report indicates that all licensees addressed in the report have determined the best estimate copper and nickel contents of their plant's beltline and surveillance welds. The report also indicates that the ratio procedure described in Position 2.1 (pages 1.99-3 and 1.99-4) of Regulatory Guide (RG) 1.99, Rev. 2, need not be applied to the pressurized thermal shock assessments and upper shelf energy assessments of RPV beltline welds made from Linde 80 fluxes.

At a meeting on April 30, 1996, representatives of the BWO provided the bases for the conclusions in the topical report. The staff informed the BWO personnel that the information presented was insufficient to support the owners group's proposal. The BWO representatives indicated that the owners group would consider performing additional work to address the staff's concerns, and would consider submitting another topical report for NRC review. The staff does not consider the BWO proposal to be acceptable at this time.

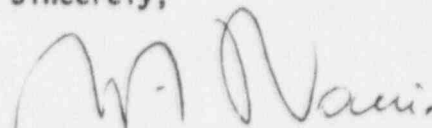
The topical report also included analyses to demonstrate that application of the ratio procedure would not cause the RT_{pts} values for the limiting materials in B&W fabricated RPVs to exceed the PTS screening criteria specified in 10 CFR 50.61. However, the report did not address potential impact of applying the ratio procedure to the development of pressure-temperature limit curves and L-TOP limits. Therefore, you are requested to provide an assessment of the application of the ratio procedure, as described in Position 2.1 of Regulatory Guide 1.99, Revision 2 (May 1988), to your pressure-temperature limit curves and L-TOP limits. This assessment should include an evaluation relative to the margins specified in applicable codes

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and standards (i.e., Appendix G to Section III of the ASME Code). You are requested to provide this assessment by December 31, 1996. Thank you for your cooperation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jan A. Norris". The signature is fluid and cursive, with the first name "Jan" and last name "Norris" clearly distinguishable.

Jan A. Norris, Sr. Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-289

cc: See next page

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and standards (i.e., Appendix G to Section III of the ASME Code). You are requested to provide this assessment by December 31, 1996. Thank you for your cooperation.

Sincerely,

(Original Signed By)

Jan A. Norris, Sr. Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-289

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Three Mile Island Nuclear Station, Unit No. 1

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