



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of )  
 )  
METROPOLITAN EDISON COMPANY ) Docket No. 50-289  
 ) (Restart)  
 )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

LICENSEE'S RESPONSE TO  
ORDER TO NRC STAFF REGARDING BOARD NOTIFICATION  
OF UNSATISFACTORY TEST RESULTS OF SAFETY VALVE

The Board, by its August 25, 1981 "Order To NRC Staff Regarding Board Notification of Unsatisfactory Test Results of Safety Valve," directed the parties' attention to NRC Board Notification No. 81-20, dated August 11, 1981, filed in the McGuire proceeding (a copy of which was attached to the Board's Order). The Board observed that the McGuire Board Notification enclosed an NRC Staff memorandum dated July 1, 1981, noting, inter alia, "that there were unsatisfactory Electric Power Research Institute (EPRI) test results for the safety valve installed in TMI-1, and that the information may be relevant for Board notification." The July 1, 1981 Staff memorandum, in turn, enclosed a June 26, 1981 EPRI memorandum reporting on the tests. As the Board pointed out in its Order, no similar notification was given in this proceeding.

The Board requested that the Staff inform the Board whether notification of this matter by the Staff would have been appropriate in this proceeding. The Board further directed the Staff, and invited other parties, "to explain the significance of the unsatisfactory safety valve test results in the context of the proposed

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findings and issues in this proceeding." Licensee here responds to the Board's Order, accompanied and supported by the attached Affidavit of James H. Correa, Engineer, Mechanical Components, GPU.<sup>\*/</sup>

The memoranda attached to the McGuire Board Notification address, inter alia, "quick look" data from the Electric Power Research Institute (EPRI) steam tests at the CE-Windsor facility during the period of June 19-25, 1981, on the Dresser valve of the type used at TMI-1. Affidavit of James H. Correa, September 4, 1981 ("Correa Affidavit"), ¶2. The memoranda reflect the preliminary results of only five of a total of fourteen steam tests on the Dresser valve of the type used at TMI-1. Correa Affidavit, ¶6.

Further, due to the nature of the screening criteria adopted by EPRI to judge valve performance in the test program, an isolated failure to meet screening criteria is not in and of itself significant. The compilation and analysis of all data associated with the full range of testing for the Dresser valve is required before well-founded engineering judgments can be made. Conclusions regarding valve performance may be drawn prior to complete analysis of all raw data only if there are repeated failures of a specific valve type under varying conditions, including actual plant conditions. This has not been the case. Correa Affidavit, ¶5.

Moreover, the control ring settings used in the test number 6 (which is the test described in the EPRI memorandum in which the

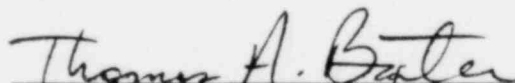
<sup>\*/</sup> Mr. Correa testified in this proceeding on UCS Contentions 5 and 6 and the Board Question on UCS Contention 6. His statement of professional qualifications may be found in the evidentiary record following Tr. 8746.

EPRI screening criteria was not met) are not representative of the settings actually used at TMI-1. The screening criteria were met in the test in which control ring settings representative of those at TMI-1 were used. Correa Affidavit, ¶8.

GPU has evaluated the preliminary results of the fourteen steam tests and has determined that, due to the significant variance between the control ring settings used at TMI-1 and those used where test screening criteria were not met, the failure to meet test screening criteria provides no basis to doubt that the TMI-1 pressurizer safety valve will perform its safety function if called upon. Similarly, the results do not alter the conclusions reached in Licensee's testimony in this proceeding on UCS Contention No. 5, Board Question/UCS Contention No. 6, and the Board Question Regarding UCS Contention No. 6.

Due to the preliminary nature of the test data reported in the EPRI memoranda, the nature of the EPRI screening criteria, the isolated nature of the failure, and -- most importantly -- the significant variance between the control ring settings used at TMI-1 and those used where test screening criteria were not met, Licensee did not, and does not, consider the failure to have significant application to TMI-1. Accordingly, Licensee did not notify the parties of the test results which are the subject of the Board's Order.

Respectfully submitted,  
SHAW, PITTMAN, POTTS & TROWBRIDGE

  
Thomas A. Baxter  
Delissa A. Ridgway

September 4, 1981