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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



Before the Commission

In the Matter of)
)
METROPOLITAN EDISON COMPANY)
)
(Three Mile Island Nuclear)
Station, Unit 1))

Docket No. 50-289 -OCA-2
(Steam Generators)

THREE MILE ISLAND ALERT'S FORMAL DEMAND FOR
ADJUDICATORY HEARING ON AMENDMENT TO TMI-1 OPERATING
LICENSE TO CHANGE TUBE PLUGGING CRITERIA

Three Mile Island Alert hereby formally demands a full adjudicatory hearing on the requested amendment to the TMI-1 Facility Operating License, No. DPR-50, submitted to the Commission on February 4, 1986, as Technical Specification Change Request No. 153.

TMIA requests a full hearing on the granting of this amendment, or any part thereof, which would alter TMI-1's current steam generator tube plugging criteria to allow TMI-1 to operate with a defective tube having a crack or imperfection with a depth equal to or greater than 40% of the tube wall thickness. The amendment as currently proposed would allow TMI-1 to operate with a defective tube having a crack or imperfection with a depth up to 50% throughwall, and .55 inches in length.

Aspects which TMIA seeks to litigate include those which the Licensing Board has already found sufficient regarding Tech. Spec. Change Request 148, in its Memorandum and Order of February 12, 1986, and which apply equally to the instant proposed amendment.

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These aspects, which also are hereby are submitted as contentions, are the following:

1. Neither the Licensee nor the NRC Staff have demonstrated that allowing degraded tubes to remain in service under the proposed revised plugging criteria will provide reasonable assurance that TMI-1 can operate without endangering the public health and safety, because the form and rate of new tube degradation has not been determined.

2. Neither the Licensee nor the NRC Staff have demonstrated that allowing degraded tubes to remain in service under the proposed revised plugging criteria will provide reasonable assurance that TMI-1 can operate without endangering the public health and safety, because the testing technique relied upon to define degraded tubes is inaccurate and inconclusive, in light of the particular method of degradation, is uncertain.

3. Neither the Licensee nor the NRC Staff have demonstrated that allowing degraded tubes to remain in service under the proposed revised plugging criteria, which could contribute to the frequency of leakage during plant operations, is consistent with the requirements of GDC 32.

4. Neither the Licensee nor the NRC Staff have demonstrated that allowing degraded tubes to remain in service under the proposed revised plugging criteria, is consistent with the requirements of GDC 31, in that the criteria does not take into account environmental effects, including possible environmental corrosion even in the absence of active corrosion mechanisms.

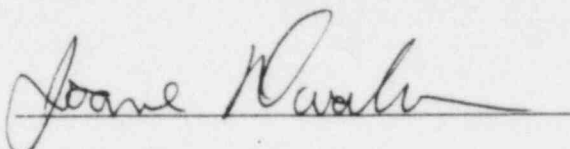
5. Neither the Licensee nor the NRC Staff have demonstrated

that allowing degraded tubes to remain in service under the proposed revised plugging criteria is consistent with Reg. Guide 1.121, which requires that plugging criteria take into account variations in tube thickness due to possible corrosion.

Respectfully submitted,

THREE MILE ISLAND ALERT, INC.

By:

A handwritten signature in cursive script, appearing to read "Joanne Doroshow", written over a horizontal line.

Joanne Doroshow

Dated: March 10, 1986