

Direct ENTRY

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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
et al :
(Three Mile Island Nuclear :
Station, Unit No. 1) :



FINAL FORMAL CONTENTIONS OF THE
NEWBERRY TOWNSHIP T.M.I. STEERING COMMITTEE
AND MICKEY MINNICH; RICHARD J. ZLOGAR; LINDA S. CARLISLE;
VIRGINIA PHILLIPS; C. WILLIS WOLFE; LINDA I. DOMINOSKI;
PATRICIA A. SMITH; DONNA K. UMHOLTZ; COLLEEN M. CLARK;
AND MICHAEL L. GLOCK, M.D.

AND NOW, to wit, this 19th day of October, 1979, comes the
Petitioners, by and through their counsel, JORDAN D. CUNNINGHAM, ESQUIRE,
and files these final and formal contentions pursuant to 10 C.F.R. 2.714(b)
and the Atomic Safety and Licensing Board's Order of September 21, 1979,
as follows:

1. The Newberry Township T.M.I. Steering Committee's concern is
concentrated, for the purposes of this intervention, to the issue of the
psychological and emotional impact upon the citizens of Newberry Township
if reactivation of Unit Number 1 is authorized by the NRC in light of the
recent accident of March 28, 1979. Operation of Unit Number 1 would be a
constant reminder of the trauma which was experienced by the members of
the Committee throughout the accident and the possibility that they would
re-experience the same trauma if, in the future, a similar accident took
place. It is averred that this is a health concern which involves the
quality of the human environment, and therefore is embodied in the NEPA

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and thus is an issue and/or contention which is proper for the NRC to consider.

2. The individual petitioners contend that the psychological impact upon themselves as a result of the accident of March 28, 1979, is also an aspect which is relevant to the quality of the human environment and is embodied in the NEPA. Petitioners further contend that the psychological fear generated in the public mind as a result of the March 28, 1979, accident has resulted in a de facto public bias and prejudice against the Newberry Township area with regard to the siting of new residential building, new businesses, and the purchasing of the existing improved parcels of real estate within the Township. It is also contended that the threat of reactivation of Unit Number 1 has and will, in the future, continue to effect the above-enumerated economical concerns. Petitioners aver that these contentions concerning health and socio-economic aspects are embodied in the spirit and language of the NEPA.

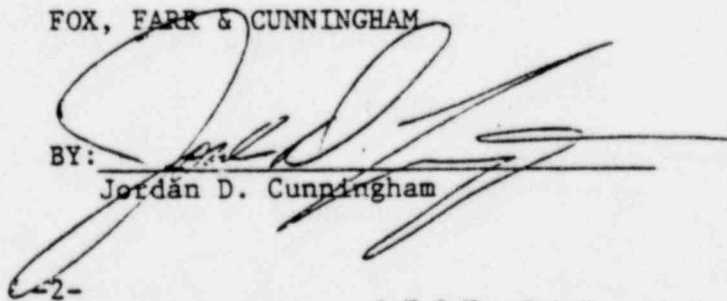
3. Evacuation planning done by Metropolitan Edison and the Nuclear Regulatory Commission is inadequate to assure the safety of the public, particularly those persons who live within a five mile radius of the plant. Operation of T.M.I. Unit Number 1 should not be resumed until a plan is in place for the evacuation of the public in the maximum area which could be effected by an accident.

Respectfully submitted,

FOX, FARR & CUNNINGHAM

DATED: October 19, 1979

BY:


Jordan D. Cunningham

CERTIFICATE OF SERVICE

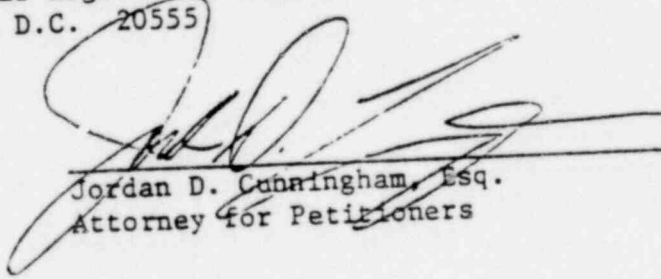
I, JORDAN D. CUNNINGHAM, hereby certify that copies of the Final Contentions in the foregoing matter have been served upon the following, by deposit in the United States Mail, First Class, postage prepaid, this 19th day of October, 1979.

Executive Legal Director
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. George F. Trowbridge, Esq.
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Secretary, U. S. Nuclear Regulatory Commission
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Attorney for Petitioners

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