UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of METROPOLITAN EDISON COMPANY (Three Mile Island Nuclear Station, Unit No. 1)

Docket No. 50-289 (Restart) 1 5 1979

LEVISED CONTENTION 4

It is contended that if TMI-1 is restarted, demonstrations will occur that will threaten the security of the entire Island, thereby presenting a clear and present danger to both TMI-1 and the damaged TMI-2 reactors. Local and State authorities are not trained nor equipped to deal with these types of civil disruptions, nor do they have the financial resources to become so equipped and trained. Licensee has not developed any plans to deal with the specialized nature of such civil disruption. If the security of TMI-1 or TMI-2 were breached, the consequences would be the release of high levels of radiation into the air and water, causing sickness and death. It is contended that it will be virtually impossible to secure the integrity and insure the safety of TMI-1 and TMI-2 when widespread civil disruption occurs.

Respectfully submitted,

eodore A. Adler

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