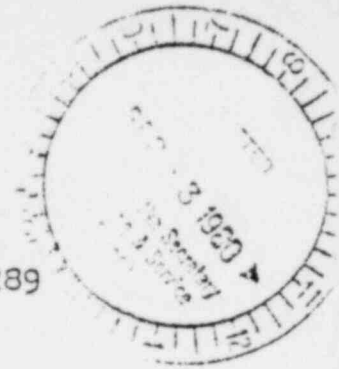


Lewis 8/28/80.

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)

INTERVENOR LEWIS'S MOTION FOR A CORRECTION TO THE RECORD AND AN  
EXTENSION TO A BOARD QUESTION.

M&O dated 8/20/80 Page 13:

"Any party may within ten days following service of this order  
make recommendation for the modification of specification of  
the board's questions or present arguments..."

Tr 2383 Dr Jordan "Is it an important part of restart that instruments  
outside of containment also be environmentally qualified in the  
Staff's opinion?"

Tr 2385 "(T)here has not been any instruments failures outside of  
containment which have contributed to the accident."

Correction to the record: There have been failures in both instruments,  
and equipment which did contribute to the accident at TMI#2 on 3/28/79.  
Equipment which failed outside of containment which contributed to accident.  
Vent header (which is leaking) Page 59 Rogovin Report. This allowed  
radioactivity to exit at dangerous and unexpected times increasing  
the exposure of the surrounding community.

Charcoal filter media. In answers to Interrogatories to Lewis Contention  
both Licensee and staff admit that less radioactive iodine would  
have been released during accident if filter media had been changed  
on a more frequent schedule.

Instrument failure outside of containment which contributed to accident:  
Page 21. Rogovin Report "Hey, we're getting water <sup>all</sup> out of the floor drains.  
The aux building sump is overflowing."

Lack of instrumentation or failure of instrumentation allowed the  
sump to overflow without any warning. Instrumentation here might  
have given clues to speed proper action to mitigate the accident.  
"The sample line has just gone up to 600 rems and hour."

Subsequent sampling of radioactive liquids during the emergency  
caused at least two workers to be exposed greatly ~~xx~~ over  
the legal allowables. Proper instrumentation on these sample lines  
might have minimized that exposures and mitigated those particular  
consequences of this accident.

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OTHER CONSIDERATIONS.

2.

Finally the progress at TMI#2 is being done in such a dangerous and slipshod manner as to endanger the operation of TMI#1 and the entire area.

I come to this conclusion thru the following documents which have only recently arrived in my possession.

NCR TMI /80-14 Page 4 No 5 Weekly Boron Analysis The licensee is now beyond the 7 day technical specification surveillance frequency and notified the TMI Program Office on Friday 8.8.80.

NCR TMI 80-125 Page 4 No 4. Weekly Boron Analysis "unable to analyze" Power Reactor News Events Vol 2 No4 July 1980 "unplanned Boron Dilution."

In a undamaged reactor in cold shutdown, weekly boron dilution readings do not change significantly unless there ~~is~~ is a reason. TMI#2 is not an undamaged reactor. There are geometries and reaction going on inside that reactor which can only be guessed at. What those geometries and reactions will do to the boron dilution is anybody's guess.

Yet the TMI Program office has determined that the cleanup can proceed without the required weekly boron analysis.

~~This~~ This lack of requirement for boron dilution analysis just is an example of the kind of dangerous and slipshod operation <sup>that</sup> is going on at #2. This dangerous and shoddy operation will affect #1 if there is an unplanned recriticality at #2.

Many structures outside of the containment are truly dangerous. Specifically the fuel pool has been brought up as a board question in Docket No 50 272 Salem Fuel Pool Expansion. I respectfully request that the Board peruse the 18 April 79 Order from Docket 50-272 to see if there is any reason to incorporate it into the Board Questions in this proceeding. (enclosed.)

Relief Sought :

I respectfully urge the Board to add a Board Question :

Are there any structures outside of the containment which need be qualified for reasons of safety? Specifically fuel pool, operations at TMI#2 which can endanger the operation of #1, and any other instances that pose an unacceptable or possible danger to the operation of TMI#1.

Respectfully submitted,

Marvin I. Lewis

215 CU 9 5964.

*Marvin I. Lewis*

CERTIFICATE OF SERVICE

RELATED CORRESPONDENCE

I hereby certify that I caused a true and correct copy of the foregoing document, [REDACTED]

Lewis 8/22/80

[REDACTED], to be placed in the United States mail,

first-class, postage prepaid addressed to the persons listed below:

Ivan Smith, Chairman  
Atomic Safety & Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

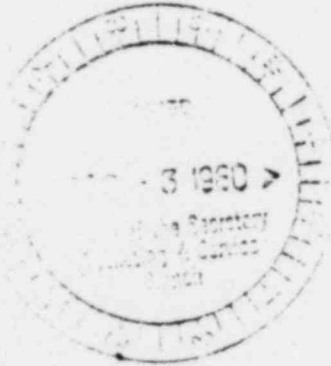
Dr. Walter H. Jordan  
881 West Outer Drive  
Oak Ridge, TN 37830

Dr. Linda W. Little  
5000 Hermitage Drive  
Raleigh, NC 27612

George F. Trowbridge, Esquire  
Shaw, Pittman, Potts & Trowbridge  
1800 M Street, N.W.  
Washington, DC 20006

Docketing and Service Section  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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

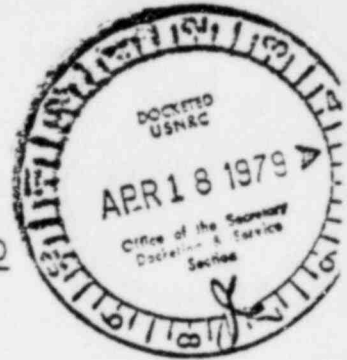


Dated: Jul 30 1980

[REDACTED]  
Marvin Lewis

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of	)	
PUBLIC SERVICE ELECTRIC & GAS COMPANY	)	Docket No. 50-272
(Salem Nuclear Generating Station,	)	(Spent Fuel Expansion)
Unit No. 1)	)	

ORDER

As previously announced on March 15, 1979 at the Special Prehearing Conference, and on March 29, 1979 in the Order Following Prehearing Conference, an evidentiary hearing has been scheduled in the above-captioned matter on May 2, 1979 in Salem, New Jersey.

The evidentiary hearing shall begin at 9:30 a.m. on May 2, 1979 in the Free Holders Meeting Room (Room No. 7), New Salem County Courthouse, 94 Market Street, Salem, New Jersey.

The Board wishes to add the following questions for discussion at the hearing:

1. To what extent did the accident at Three Mile Island affect the spent fuel pool at that site?
2. If there had been an explosion or "meltdown" at Three Mile Island, what affect would that have had upon the

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- spent fuel pool? To what extent would it have mattered how much spent fuel was present at the pool?
3. If an accident such as the one at Three Mile Island occurred at Salem, to what extent would the accident affect the spent fuel pool? If an explosion or "meltdown" occurred at Salem, to what extent would that affect the spent fuel pool? To what extent would it have mattered how much spent fuel was present at the pool at Salem?

The Board desires that the Licensee and the Staff present at the hearing whatever evidence is necessary to address the above questions.

SO ORDERED.

FOR THE ATOMIC SAFETY AND  
LICENSING BOARD

*Lester Kerubel, Jr.*  
For Gary L. Milhollin, Chairman

Dated at Bethesda, Maryland  
this 18th day of April 1979.