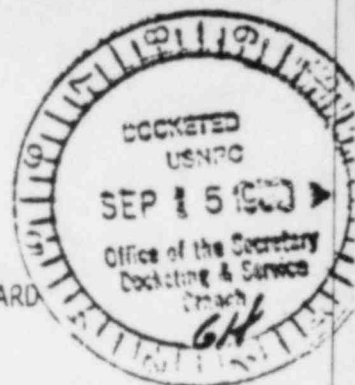


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

SECOND FINAL AMENDED CONTENTIONS OF NEWBERRY TOWNSHIP
TMI STEERING COMMITTEE, ET AL. TO THE METROPOLITAN EDISON
EMERGENCY PLAN; YORK COUNTY PROTECTIVE ACTION PLAN FOR THE
THREE MILE ISLAND NUCLEAR POWER PLANT; AND DAUPHIN COUNTY FIXED
NUCLEAR FACILITY INCIDENT RESPONSE PLAN

ADDITIONAL CONTENTIONS
DAUPHIN COUNTY PLAN

12. The chain of command as set forth in the Dauphin County Plan is deficient in that the Plan does not state who is in charge of evacuation with regard to specific areas; the Plan does not state who is in charge of emergency personnel once they have been withdrawn to a staging area. The Plan does not list the second in command to local Emergency Coordinator Directors and this raises the issue of whether there are seconds in command to replace those who have somehow become disabled or not present at the time of the emergency. There is no indication in the Dauphin County Plan that if there are Assistant Directors, how they will know they are in command, and if there are no seconds in command, who will assume the responsibility of the Emergency Coordinator Directors in their absences. All of these deficiencies render the Dauphin County Plan inadequate.

13. The Dauphin County Plan does not specifically state a differentiated commonly recognized evacuation signal that could be recognized by the citizenry throughout the county. The Plan does not indicate whether the alarm system

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that is to be used is to be driven by a regular power system and if the source was terminated, whether the system would still work. The Plan does not indicate whether all areas within the county are within hearing distance of the sirens. Such deficiencies render the Emergency Response Plan inadequate.

14. The Dauphin County Plan does not specifically state how the following occurrences would be dealt with in the event of an evacuation:

- (a) Accidents on the highways;
- (b) Cars running out of gas;
- (c) Generally disabled vehicles; and
- (d) Individuals who need ambulance service for removal from accidents.

The Plan does not state whether gas stations will be mandatorily required to be open in order to meet the demands of the evacuating public.

Finally, the Plan seems to assume that the best of all atmospheric and weather conditions would exist at the time of the evacuation. What would take place in the event of a snowstorm and how would that effect the evacuation? What would be done in order to clear the roads? These are all questions that have to be considered and are necessary to be considered in a total evacuation plan and the location and placement of staging areas.

15. The Dauphin County Plan indicates that it has a total need of approximately 600 ambulances for the evacuation of all members of the exposed populace and indicates only 45 are available. The Plan also indicates that it could obtain an additional 226 ambulances from outside the county, still leaving a shortfall of approximately 300 ambulances. There is no solution to the problem indicated in the Plan and it is submitted that there are other deficiencies, conflicts as to the number of ambulances required within the Plan and that without further specification, the Plan remains deficient.

16. The Dauphin County Plan as set forth does not provide for differentiation of time of day or seasons or weather conditions at the time of the evacuation. There is no sensitivity analysis as to these factors, and the Plan is based upon an assumption of best-case analysis. Therefore, it is Intervenor's position that without taking these factors into consideration, the Plan remains deficient as concerns the time needed to effect an evacuation.

17. The Dauphin County Plan lists only two (2) 911 operators in place in the event of an evacuation. It is submitted that two operators is grossly insufficient when it is taken into consideration that the York County Plan incorporates forty-nine (49) 911 operators in order to deal with an evacuation. Until and unless there is a commitment for more 911 operators to be in place during an emergency, the Dauphin County Plan remains deficient.

18. The Dauphin County Plan as presently written envisions mass transportation vehicles to assemble at two staging areas. Upon arriving at the staging areas, the vehicles would then be dispatched to various areas to be led by community leaders. It is submitted that such a plan without the provision of security being placed on the buses and mass transportation vehicles does not ensure that said vehicles will be able to carry out their intended functions. It is submitted that more staging areas would be required in order to effectively deal with mass transportation and until and unless those local regionalized areas are stated in an emergency plan, all plans will remain deficient.

19. The Dauphin County Plan is deficient in that there is no long-term management provision in the event of an evacuation which would last greater than three days. Without such long-term planning, there is a possibility and a probability that confusion would reign after an evacuation of three days and it is submitted that in the March, 1979 incident, the evacuation lasted for five

days. Therefore, until and unless there is greater long-term management planning provided for in the emergency plan, the Plan remains deficient.

FOX, FARR & CUNNINGHAM

By: 

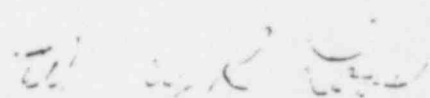
Jordan D. Cunningham, Esquire
2320 North Second Street
Harrisburg, Pennsylvania 17110
717/238-6570
Attorney for Newberry Township TMI
Steering Committee

Date: September 11, 1980

COMMONWEALTH OF PENNSYLVANIA)
) ss.
COUNTY OF DAUPHIN)

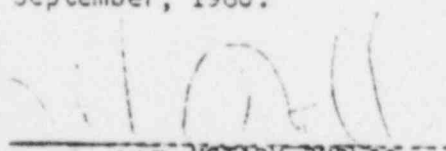
I, WENDY R. LOOS, Word Processing Operator of the firm of Fox, Farr & Cunningham, do hereby swear and affirm the following:

1. On Monday, September 8, 1980, I was programming into the Wydec Word Processor in the office of Fox, Farr & Cunningham the Second Final Amended Contentions of Newberry Township TMI Steering Committee;
2. That upon printing said Second Final Amended Contentions, a certain section of the Contentions, namely those contentions enclosed herein and referenced as "Additional Contentions, Dauphin County Plan" were not displayed and printed out for inclusion in the original Second Final Amended Contentions.
3. That on Thursday, September 11, 1980, the oversight was discovered, the additional contentions were printed out, are enclosed herewith entitled "Additional Contentions, Dauphin County Plan" and should be included with the Second Final Amended Contentions as previously submitted.



WENDY R. LOOS

Sworn and subscribed to
before me this 11th day of
September, 1980.



NOTARY PUBLIC

GEORGE A. ZIMMER, NOTARY PUBLIC
BERKS COUNTY, DAUPHIN COUNTY
MY COMMISSION EXPIRES SEPT. 29, 1981
My Comm. No. is 1011, Commission of the State of Pa.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

METROPOLITAN EDISON COMPANY,
et al.
(Three Mile Island Nuclear
Station, Unit No. 1)

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:
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:
:

Docket No. 50-289

Restart

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Additional Second Final Amended Contentions was mailed First Class, postage prepaid, this 11th day of September, 1980, to the following:

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
Attn: Chief, Docketing Service Section

Ivan W. Smith, Chairman
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

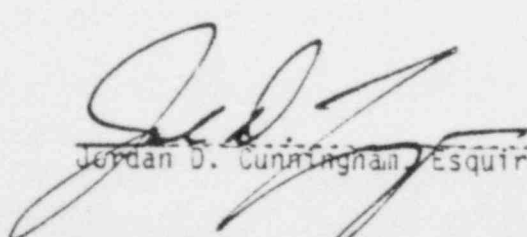
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Jordan D. Cunningham, Esquire