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November 11, 1980

DOCKET NUMBER **50-289**
PROD. & UTIL. FAC... **50-320**

Mr. John F. Ahearne
Chairman Commissioner
U. S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555



RECEIVED 11 13 1980

Subject: Docket 50-289SP
TMI - Unit 1
Middletown, PA

Dear Commissioner Ahearne:

I am writing with regard to the Nuclear Regulatory Commission's proceedings, begun on 15 October, 1980, on whether or not Metropolitan Edison Company shall be permitted to restart Unit 1 of Three Mile Island.

My interest in this matter arises in two ways. First, I am currently enrolled in the Nuclear Engineering Graduate Program at the University of Wisconsin - Madison, and will receive my Master of Science degree in Nuclear Engineering in May, 1981. As a nuclear engineer, I am obviously concerned about the decisions reached not only on the Unit 2 Cleanup, but on the future of Unit 1 as well. Second, I am a resident (permanent) of Reading, Pennsylvania, which is located approximately 40 miles due east of Three Mile Island and is within Metropolitan Edison's service area. As a resident of Reading, I am obviously concerned about the well-being of the residents of Metropolitan Edison's service area, and therefore about the welfare of Metropolitan Edison.

As I'm sure you understand better than I, there have been many reasons behind the Nuclear Regulatory Commission's decision to keep Unit 1 off-line. While the reactor was not damaged during the accident at Unit 2, several changes, mandated by the NRC following the accident at Unit 2, have been ordered for all operating reactors. It is not appropriate to require Unit 1 to remain off-line until all the retrofittings are completed, since other on-line units were not required to shut down until all changes were completed. Such action would be discriminatory and unjustified.

On the question of operator training, the Unit 1 staff's training has been evaluated and found to be adequate, if not quite good. Mr. Richard Cashwell, operator of the Nuclear Reactor Laboratory here at the University of Wisconsin participated in the reevaluation, and stated, along with the other members of the group, that the operators were not lacking in training. The NRC will have an opportunity to check this evaluation, since, if Unit 1 is to be restarted after such a long shutdown, the Unit 1 staff will have to be relicensed.

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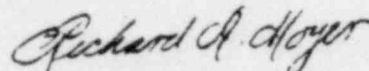
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Perhaps the single biggest reason for the shutdown of Unit 1, however, has been the question of Metropolitan Edison's ability to run Unit 1 safely while maintaining Unit 2 in a safe, stable configuration and proceeding with cleanup operations. The evaluation of the Unit 1 staff and the record of the cleanup operations to date indicate that Metropolitan Edison has the staff to deal with both of these problems. The overriding consideration must be financial resources. As I'm sure you are aware, Metropolitan Edison is in a poor financial state, due primarily to costs incurred following the Unit 2 accident that it has not been able to pass on to its customers. The lion's share of this cost has been for replacement power, not just for the Unit 2 that would have been on-line now, but for Unit 1 as well, which had been operating prior to the accident until a scheduled refueling outage. The longer Unit 1 is kept off-line, the worse this situation will get. If Metropolitan Edison's future is threatened, so must be the maintenance and cleanup efforts at Unit 2. One obvious way to improve this situation would be to allow Unit 1 to restart, thereby cutting the need for replacement power and placing Metropolitan Edison on a surer financial basis by minimizing its losses.

Metropolitan Edison has addressed the question of operator ability. An independent evaluation has certified that the Unit 1 staff is as well trained as the staff of any other operating reactor. Retrofitting of the Unit 1 can proceed as it has for all other operating reactors. But the utility's ability to cleanup Unit 2 is threatened by imminent financial collapse of the utility. I believe that restarting Unit 1, thereby drastically reducing Metropolitan Edison's costs of purchasing replacement power will enhance the utility's ability to safely recover Unit 2. Such action is obviously in the best interests of the residents of the Three Mile Island and Metropolitan Edison service areas.

Sincerely,



Richard A. Moyer

P.S. Copies of this letter have been sent to the Reading Eagle/Times newspapers and the Friends and Family of TMI.