



ANGRY 2/5/81



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of
Metropolitan Edison Co.
TMI-1

DOCKET 50-289

ANGRY REQUEST FOR RECONSIDERATION ON ANGRY MOTION TO
ADOPT EMERGENCY PLANNING CONTENTIONS ABANDONED BY MR. SHOLLY

Intervenor Anti-Nuclear Group Representing York moves to adopt the following contentions of Mr. Sholly which he abandoned:

8I F, 8I G, 8I J. (all "on-site" in Mr. Gray's list):

8II B, 8II D, 8II G, 8III A, 8III E, 8III F.
(all "off-site" in Mr. Gray's list)

and, ANGRY moves to adopt Mr. Sholly's 8I R (off-site) "in exchange" for a similar contention, ANGRY III (a)(e). If ANGRY is not granted Mr. Sholly's 8I R, ANGRY does not wish to drop ANGRY III (a)(e), and conversely, ANGRY will drop III(a)(e) if allowed to adopt Mr. Sholly's contention 8I R. ANGRY considers Mr. Sholly's 8I R more litigable and specific; the concern is exactly the same.

The Contentions

Mr. Sholly's contentions that we wish to adopt are appended. ANGRY assures the board that none of the Sholly contentions are duplicated in ANGRY contentions (except as noted above-- 8I R). At the Emergency Planning meeting among intervenors on Dec. 19, 1980, Mr. Zahler, counsel for licensee, presented a table of contentions indicating which contentions he requested intervenors drop (enclosed). Mr. Zahler verbally went through all contentions listing his reasons for asking intervenors to consider dropping contentions. These reasons were 1) duplicated in another party's contention, 2) duplicated in reference to another county or state agency, and 3) contention "too specified" reiterating same point in a series of examples or contention too long.

Mr. Zahler's objections to Sholly contentions are indicated on the enclosed chart of Sholly contentions by *. In all, he objected to 66 contentions: six of Sholly's, 17 of ANGRY's, and 43 of Newberry's.

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Of the six Sholly contentions Mr. Zahler found one (8I E) to be not as litigable as ANGRY IIIa j. This contention (8I E) we are not requesting the Board to allow us to adopt.

Another Sholly contention, 8II A, on the 10-mile EP2 concept. Mr. Zahler found repetitive of the ANGRY/Sholly contention 8I E ("old Sholly 8C") and ANGRY will not press the point of the distinction and will not ask to adopt that one.

Of the remaining four Sholly contentions Mr. Zahler found inferior to, or repetitive of, other contentions, all were compared to Newberry contentions. ANGRY is asking to adopt all four of these that Mr. Zahler asked Sholly to drop on Dec. 19.

Intervenor Consolidation Problems

Early on in this hearing the Board asked Intervenor to consolidate on issues as much as possible. We have tried. Consolidations have, perhaps, simplified issues but intervenors have suffered because of it, and more important the record has suffered.

As an example, the Board denied ANGRY's "Class 9" contention and allowed us to adopt UCS 13. We did. For their own reasons (which we understand) UCS finally decided not to be present for "Class 9" testimony. ANGRY counted on UCS and was very disappointed to find out at a very late date that UCS could not litigate "Class 9" to ANGRY's satisfaction.

Can the Board assure, positively, that Newberry will litigate ANGRY's concerns to ANGRY's satisfaction? Is the Board sure that Newberry will not have to drop out for financial reasons as so many parties have? We think not. ANGRY isn't willing to risk it.

ANGRY arranged with Mr. Sholly a year ago that he would concentrate in some areas, we in others. We did this at the Board's request. The Board will find that we have few overlaps and have worked together to form "joint" contentions. Now, Mr. Sholly has found that he is not able to litigate his Emergency Planning Contentions. We are again very disappointed. We would have "staked out" more Emergency Planning "turf" when filing reconsiderations had we not known that Mr. Sholly was "covering" areas. We chose to not duplicate his efforts at the Board's request.

ANGRY and Newberry do have overlapping concerns, the difference,

which may not be evident from the contentions, is that we have different viewpoints on how to litigate our concerns.

We doubt that "even without any intervenor contentions, a full and complete record on emergency planning matters will be developed" as Mr. Zahler asserted in his objection of 1/17/81. Intervenors have special expertise unavailable to any other party: we live here, and we know the area. The record needs our help. Even today Mr. Gray tells us FEMA is still not ready on some of the off-site study.

Timeliness

ANGRY agreed with Mr. Zahler to present a report on Emergency Planning by Jan. 9. We reported on Jan 8 and offered to present a finalized cross-referenced full version of surviving contentions divided by issues and by on-site/off-site. We studied carefully to see if we could drop any contentions. ANGRY decided not to drop more than two: ANGRY III (b)(h).3; and ANGRY III (b)(k). (Both contentions relate to the Commonwealth's plans and we are satisfied on both counts.)

Then we got into trouble. We moved orally to adopt Sholly 8-9 contentions that survived. We should have provided the Board with more information and specifics.

On January 19 the Licensee responded. We don't mean to be too picky, but that response was after the ten-day response period. We were not served a copy until 2pm on Jan 27, and we do mean to be picky about that. The Licensee has been lax several times now about getting services to ANGRY in time. Mr. Zahler may have been "busy" and unable to answer sooner, we all understand that. However we must insist that the Licensee is the one party not entitled to any excuses by way of lateness. They insist on this brutal pace the hearings barrel along at. They must be prompt.

ANGRY brought our procedural concern about the Board's Jan 27 ruling to the Board's notice as soon as possible. We were not able to see the Jan 8 transcript in Washington, where ANGRY's representative was until January 30, when it was available at the PDR at 1717 H St. ANGRY's representative looked for the transcript there on Jan 29. It was not yet shelved and available. We brought our concern to the Board's attention Feb 3, which was the next day of hearings.

The Staff had no objections to ANGRY's adoption of the surviving Sholly 8-9 contentions. We asked Mr. Tourtellotte for procedural advice as soon as we realized what our procedural problem was and found the transcript reference, he said that filing a motion for reconsideration of the Board's Jan 27 ruling might be in order. We said we would do that. That was on Jan 29. So, between Jan 8 and now the Staff has only had two days when the Sholly contentions were not "in limbo." All of these contentions were filed last September and are not new to parties. We're sorry if the Staff was put off schedule on the three on-site contentions we want to adopt.

These three on-site contentions relate to two subjects. The first is the letters of agreement the Licensee has with off-site agencies to provide services to Met-Ed employees and to the Island in the event of an emergency. These two contentions (8I F, 8I G) are a pair that set forth the concern and very specific failings of the Licensee's letter of agreement. ANGRY has a similar sort of contention (which covers letters of agreement between York County and supporting services) and we were extensively cross-examined on it during discovery as was Mr. Sholly on his. We think the Licensee has had more than ample time to consider how to address this question. They have either changed the letters or they haven't. Either way, a few days can't matter after all the discovery they did. (We would grant them an extension to the length of the hearings if they wanted.)

The second on-site issue is crucial. It asserts that the operators may not recognize that an accident situation has started within the 10 minutes that that is supposed to happen in. The TMI-2 accident is surely an example of operators not realizing a serious accident was in progress. (Sholly 8I J).

None of the Sholly contentions we want is any less valid as a contention just because Mr. Sholly no longer lives in the Harrisburg area. The contentions have all been around since September (at least) Licensee and Staff and Commonwealth have had ample time to ask discovery questions. Mr. Sholly chose his issues carefully, phrased them well, and we have selected only those we truly want and can litigate.

Served on Staff, Licensee
and Commonwealth in Harrisburg
on Friday morning 2/6/81.

Respectfully,

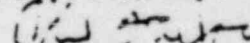

Gail Bradford
for ANGRY

CHART OF SHOLLY EMERGENCY PLANNING CONTENTIONS AND STATUS

8I A	timely + reliable communications	dropped	Cff
8I B	10-mile EPZ	accepted	Cff
8I C	4th largest pop. EPZ	dropped	Off
8I D	Licensee credibility to public	dropped	Cn
* 8I E	Time estimates (see ANGRY III aj)	<u>drop now</u>	Cn
* <u>8I F</u>	scope and nature of support services	<u>keep</u>	<u>Cn</u>
<u>8I G</u>	specifics of letters of agreement	<u>keep</u>	<u>Cn</u>
<u>8I H</u>	Investment exposure EPZ planning	<u>keep</u>	Cff
8I I	Audit + Review of plan for life of plant	accepted	Cn
<u>8I J</u>	Operator recognition of accident beginning	<u>keep</u>	<u>Cn</u>
8I K	On-site radiation equipment readiness	<u>drop now</u>	Cn
8I X-P	Cumberland County	dropped	Cff
8I Q	Licensee plan to pre-inform public	<u>drop now</u>	Cn
* <u>8I R</u>	Public education (exchange for ANGRY III ae)	<u>keep</u>	Cff
* <u>8II A</u>	10-mile plume EPZ. 20-mile readiness	<u>drop now</u>	Off
<u>8II B</u>	State's planning assumptions	<u>keep</u>	Cff
8II C	State's rad monitors in inclement weather	<u>drop now</u>	Cff
* <u>8II D</u>	time estimates affected by events - weather	<u>keep</u>	Cff
8II E	Use of contaminated stuff after accident	dropped	Cff
<u>8II G</u>	June 16, 1980 drill and drill concept	<u>keep</u>	Cff
* <u>8III A</u>	reliance on non-existing municipal resources	<u>keep</u>	Cff
8III B-F	Cumberland County	dropped	Cff
<u>8III E</u>	15-minute notification ability	<u>keep</u>	Cff
<u>8III F</u>	15-minute notification of transients	<u>keep</u>	Cff
8III G	Public education (County plans)	<u>drop now</u>	Cff
8III H	County-plan assumptions	dropped	Cff

Notes:

* Mr. Zahler objected to these contentions on Dec. 19

drop now --- means that ANGRY does not seek this contention

dropped--- means that Mr. Sholly dropped this contention

accepted--- means that Board granted ANGRY this contention Jan 27

keep--- means that ANGRY wishes to adopt this contention

exchange--- (Sh 8I R) ANGRY wishes to "exchange" this for similar ANGRY contention not as well worded. ANGRY will drop ANGRY IIIae if permitted to adopt Sh 8I R

Cff---means an "off-site contention (Mr. Gray's list)

Cn--- means an "on-site" contention (Mr. Gray's list)

TEXT OF THREE SHOLLY "ON-SITE" CONTENTIONS ANGRY SEEKS

SHOLLY
SI F

(F) Licensee's Emergency Plan contains insufficient descriptions of the nature and scope of support services provided by contractors, the qualifications of such contractors to perform the specified services, and mutually acceptable criteria for the implementation of such services.

SHOLLY
SI G

(G) The "letters of agreement and understanding" appended to the Licensee's Emergency Plan contain numerous defects as noted below.

DEFECT 1--Provides no clear concept of radiological response operations.

DEFECT 2--Lacks sufficient details on the nature and scope of support.

DEFECT 3--Fails to specify mutually acceptable criteria for the implementation of emergency assistance.

DEFECT 4--No letter of agreement provided, but should be.

1. General Public Utilities, 1 & 3.
2. PEMA, 1.
3. York County, 1 & 3.
4. Lancaster County, 1 & 3.
5. Bureau of Radiation Protection, 1 & 3.
6. U. S. Coast Guard, 1 & 3.

SHOLLY
8I C

7. Conrail, 1.
8. NRC, 1 & 3.
9. Middletown Fire Department, Liberty Fire Co. #1, 1.
10. Rescue Hose Co. #3, 1.
11. Union Hose Co. #1, 1.
12. Bainbridge Fire Company, 1.

SHOLLY
8I J

- (J) Licensee's Emergency Plan, in section 4.4.1, asserts, without explanation or basis, that Licensee's emergency classification system is designed to permit operators to recognize and declare emergencies within 10 minutes of the initiating event. In the light of events during the TMI-2 accident (3/28/79 et seq.), there is no basis for reliance on this time limit for recognition of and declaration of an emergency at TMI-1. Licensee's Emergency Plan should reflect the potential for failure to promptly recognize and declare an emergency, and should include contingency plans and procedures for coping with this eventuality. This is especially important within the context of the time available for implementing protective actions in the Plume Exposure EPZ; this was recognized in NUREG-0396 at page 19 where it is stated that the time available for action is "strongly related" to the time consumed in notification. Notification cannot commence until an emergency is recognized and declared.

OFF-SITE SHOLLY CONTENTIONS ANGRY SEEKS TO KEEP (SIX)

SHOLLY
2 II B

(B) The assumptions stated on page 6 of the Revised Edition of Annex E as noted below are without basis and reliance on these assumptions during an emergency may place the public health and safety at significant risk depending upon the severity of the emergency at TMI-1:

1. Federal agencies will provide for the Commonwealth's essential "unmet" needs on a timely basis.
2. For planning purposes, persons evacuated from a risk area will prepare to remain outside that risk area for at least three days.
3. At least 50% of the population at risk will make independent provisions for sheltering in the event of necessity to evacuate.

None of these assumptions is justified in the Annex E plan. Number 1 is not justified in any manner and if it is to be retained and relied upon as a planning basis, must be supported with agreements which specify what assistance is available, from whom it is available, and under what conditions is it available. Numbers 2 and 3 relate to planning assumptions for host counties and are without basis; reliance on these two assumptions, if they are incorrect, could lead to significant problems in host centers.

SHOLLY
8 II D

- (D) Evacuation routes and time estimates for TMI-1 do not reflect possible impediments to egress routes, such as rush hour traffic, inclement weather, or seasonal changes in traffic flow (caused, for instance, by the State Farm Show or similar function, or by tourist traffic).

SHOLLY
8 II G

The Commonwealth's method of testing its emergency preparedness by using drills where the specific scenario is known to all participants well ahead of the scheduled date for the exercise limits the effectiveness of such testing to very low levels. The June 16, 1980 drill is a prime example of this situation, wherein even though the parties to the drill knew ahead of time the starting and conclusion times for the exercise, the accident scenario that would be used, and the fact that the exercise would end in a call for an evacuation, major problems developed, especially regarding the Health Department and the relationship of PEPA and BRP. This drill shows conclusively that the Commonwealth's readiness for an emergency at TMI-1 is not sufficient to adequately protect the public health and safety. Until such time as thorough improvements in planning and by drills which are unannounced that the Commonwealth can demonstrate an adequate level of emergency preparedness, restart of TMI-1 should be denied.

EP-19 (Sholly)

Defects in the county and local government plans:

(A) The county plans are inadequate due to the inadequacy of municipal resources and services needed for effectuation of the county plans.

SHOLLY
E III A

(E) None of the five county plans within the proposed Plume Exposure EPZ has demonstrated that they have the capability of meeting the new prompt notification requirements of the NRC emergency planning rule (10 CFR Part 50, Appendix E, IV, D, 3) requiring the capability of essentially complete notification of the public within the Plume Exposure EPZ within about 15 minutes. Until this capability is demonstrated to exist, TMI-1 restart must be denied.

SHOLLY
E III E

(F) None of the five county plans within the proposed Plume Exposure EPZ has demonstrated adequate planning for notification of transients during an emergency at TMI-1.

SHOLLY
E III F

ANGRY CONTENTION EXCHANGE FOR SHOLLY CONTENTION

ANGRY
III AE

The adoption of the Commonwealth of Pennsylvania Disaster Operations Plan Annex E (DOP) designation of "the 'risk county' as responsible for the preparation and dissemination of information material on protective actions to the general public" (p. 6-8) conflicts with the requirements in EPRG II(A)(7) and RG 1.101 § 6.4(2) to

make available on request to occupants in the LPZ information concerning how the emergency plans provide for notification to them and how they can expect to be advised what to do.

Also, N. 0654 G4.

SHOLLY
EIR

The new emergency planning rule (10 CFR 50.47b7 and 10 CFR Part 50, Appendix E, IV, D, 2) imposes new responsibilities on the Licensee regarding dissemination of information to the public on a periodic basis on how they will be notified in the event of an emergency and what their initial actions should be. Provision is made in the new emergency planning rule that annual dissemination of such information to the public within the plume exposure pathway EPZ shall be made, and that signs be posted to disseminate such information to transients. Licensee's emergency plan lacks information on how these requirements will be met. As a precondition

(SHOLLY
EIR)

to restart, Licensee must be required to demonstrate reasonable progress toward achieving compliance with these provisions. If restart is permitted after the required compliance date, April 1, 1981, Licensee must, as a precondition to restart, demonstrate full compliance with these provisions. The first dissemination of the required information, in this instance, should be required to take place several weeks prior to restart to ensure that the public has sufficient time to read and understand the information. Dissemination of such information through distribution with utility bills is insufficient since many of the residents of the plume exposure pathway EPZ are not customers of the Licensee, and many residents are not directly customers of any utility, and would not, therefore, be reached by such a distribution system.

5-11-40 to 4c in reference.

ANGRY -> Ed 1 Ed 27

* = notation
of Sholly # crossed
out

(THIS CHART WAS PREPARED BY LICE: JEE)

ONSITE EMERGENCY PLANNING

A. Organization and Coordination

1. Manpower

old numbers
4(D)
4(J)

This column has
numbers in use

ANGRY III(a)(f)
ANGRY III(a)(m)

E.2
A

old numbers

2. Letters of Agreement

~~4(B)~~ ANGRY III(a)(d) E.2
~~15(A)~~ Newberry Met Ed 1 S.1
* ~~17(F)~~ Sholly 8(I)(f) E.1
17(G) Sholly 8(I)(g) E.1

keep

3. Coordination with Other Plans

~~15(G)~~ Newberry Met Ed 4 Not included
~~15(E)~~ Newberry Met Ed 6 Not included

B. Initial Accident Assessment

1. Classification

8 ECNP 2-9 Not included
9 ECNP 2-10 Not included
17(J) Sholly 8(I)(j) A

2. Radiation Monitoring

3(C) ANGRY II(f) I
~~4(I)~~ ANGRY III(a)(k) A
17(K) Sholly 8(I)(k) I
20 Sholly 9 I

C. Initial Accident Notification

1. Communications

1 Aamodt 4 Not included
~~4(E)~~ ANGRY III(a)(g) B
~~4(G)~~ ANGRY III(a)(i) B
~~15(B)~~ Newberry Met Ed 3 B

2. Alerting the Public

~~15(F)~~ Newberry Met Ed 7 D
17(P) Sholly 8(I)(q) D

D. Onsite Emergency Response

1. Mobilization of Resources
2. Offsite Resources
3. Recovery

E. Offsite Emergency Response

1. Definition of EPZ's

17(B)	Sholly 8(I) (b)	Not included
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2. Education Program

4(C)	ANGRY III(a) (e)	D
17(Q)	Sholly 8(I) (r)	D

3. Protective Action Options and Decisionmaking

4(H)	ANGRY III(a) (j)	A
7	ECNP 2-8	Not included
11	ECNP 2-33	Not included
17(E)	Sholly 8(I) (e)	C
17(H)	Sholly 8(I) (h)	D

Drop New

*

4. Logistics

F. Maintaining Emergency Preparedness

1. Emergency Training
2. Exercises and Drills

4(F)	ANGRY III(a) (h)	J
15(D)	Newberry Met Ed 1	H

3. Audit and Review of Plans

17(I)	Sholly 8(I) (i)	K
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(THIS CHART WAS PREPARED BY LICENSEE)
OFFSITE EMERGENCY PLANNING

AM [unclear]

A. 1. Manpower

5(H)	ANGRY III(b)(k)	Not included
14(F)	Newberry York 6	E.2
14(G)	Newberry York 7	E.2
14(K)	Newberry York 11	E.1
14(Y)	Newberry York 24	E.3
14(LL)	Newberry York 38	E.1
16(B)	Newberry Dauphin 2	D and E.1

2. Police

14(H)	Newberry York 8	E.3
14(J)	Newberry York 10	E.1 and E.3
14(L)	Newberry York 12	E.1
14(R)	Newberry York 17	E.3
14(X)	Newberry York 23	E.1
14(OO)	Newberry York 3(b)(12)	E.3
16(I)	Newberry Dauphin 9(a)	E.3

3. Fire Companies

14(S)	Newberry York 18	E.1
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4. Red Cross

14(II)	Newberry York 35	E.1 and F
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5. Letters of Agreement

6(D)	ANGRY III(c)(10)	E.2
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B. 1. Classification

2. Radiation Monitoring

18(C)	Sholly 8(II)(c)	I
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C. 1. Communications

6(C)	ANGRY III(c)(9)	Not included
14(D)	Newberry York 4	E.1
14(N)	Newberry York 14	D
16(C)	Newberry Dauphin 3	D and E.1

2. Alerting the Public

5(D)	ANGRY III(b)(g)	D
14(A)	Newberry York 1	D and E.1
14(B)	Newberry York 2	D
14(O)	Newberry York 13	D
14(T)	Newberry York 19	D
14(FF)	Newberry York 32	D and F
16(E)	Newberry Dauphin 5	D
16(M)	Newberry Dauphin 13	D
19(E)	Sholly 8III(e)	D
19(F)	Sholly 8III(f)	D

D. Onsite

- 1.
- 2.
- 3.

E. Offsite

1. Definition of EPZ's

~~18(A) Sholly 8(II)(a) E.2~~

2. Education Program

~~14(G) Newberry York 16(a) D, E.1 & E.2~~
~~19(G) Sholly 8(III)(g) D~~

3. Protective Action Options and Decisionmaking
 (a) Criteria to be applied

~~5(B) ANGRY III(b)(a) Not included~~
~~5(E) ANGRY III(b)(h) C and E.2~~

(b) Estimates of time to evacuate

~~14(DD) Newberry York 30 E.2~~
~~14(HH) Newberry York 34 E.2~~
~~14(KK) Newberry York 37 E.1~~
~~14(MM) Newberry York 39 E.1~~
~~16(P) Newberry Dauphin 16 E.2~~
~~18(D) Sholly 8(II)(d) E.2~~

4. Logistics

(a) Evacuation - General

~~6(B) ANGRY III(c)(8) E.3~~
~~14(G) Newberry York 3 D, E.1, E.2 & F~~
~~14(W) Newberry York 33 E.2~~
~~14(CC) Newberry York 39 E.1~~
~~16(G) Newberry Dauphin 7 E.1~~
~~16(H) Newberry Dauphin 8 E.1~~
~~16(J) Newberry Dauphin 9(b) E.1~~
~~16(R) Newberry Dauphin 18 E.1~~

(b) Evacuation Routes

~~14(U) Newberry York 20 E.1~~
~~14(NN) Newberry York 40 E.2~~
~~16(N) Newberry Dauphin 14 E.1~~

Disc
New

Keep

(c) Use of Buses

14(V)	Newberry York 31	E.1
14(AA)	Newberry York 26	E.1
16(T)	Newberry Dauphin 3(c)(5)	E.1

(d) Invalids and Nonambulatory Patients

6(F)	ANGRY III(c)(12)	E.1 & B.2
14(I)	Newberry York 9	D & E.2
16(K)	Newberry Dauphin 10	E.1
16(O)	Newberry Dauphin 15	E.1

(e) EOC's and Communications

14(E)	Newberry York 5	E.1
14(P)	Newberry York 16(a)	D & E.1
16(D)	Newberry Dauphin 4	E.1
16(F)	Newberry Dauphin 6	E.1
16(Q)	Newberry Dauphin 17	E.1

(f) Shelter of Evacuees

13	ECNP 2-38	Not included
14(EE)	Newberry York 31	E.1 & F
16(A)	Newberry Dauphin 1	E.2
16(L)	Newberry Dauphin 11	E.1 & F
16(S)	Newberry Dauphin 19	F
18(B)	Shelly 8(II)(b)	E.2

Keep ★

(g) Decontamination

6(A)	ANGRY III(c)(7)	Not included
10	ECNP 2-28	Not included
14(B)	Newberry York 35	E.1 & F
14(JJ)	Newberry York 36	E.1

(h) Thyroid Blocking Medication

5(A)	ANGRY III(b)(d)	E.1
6(E)	ANGRY III(c)(11)	E.2
14(U)	Newberry York 13	Not included

(I) Evacuation of Farm Animals and Farmers

2	Aamodt 5	Not included
4(A)	ANGRY III(a)(b)	E.1
5(G)	ANGRY III(b)(3)	E.2
6(G)	ANGRY III(c)(13)	F
14(BB)	Newberry York 37	Not included

(J) Dissemination of information

12	ECNP 2-36	Not included
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F. 1. Emergency Training

5(F) ANGRY III(b)(i) Not included

2. Exercises and Drills

~~18(F) Sholly 8(II)(g) E.2 & 5~~

3. Audit and Review of Plans

G. Miscellaneous

3(A) ANGRY II(a) E.1

3(B) ANGRY II(d) Not included

~~5(C) ANGRY III(b)(f) E.2~~

14(GG) Newberry York 33 E.1

~~19(A) Sholly 8III(a) E.1~~

Keep SA

Keep SA

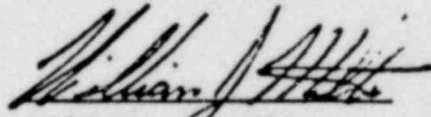
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of Intervenor ANGRY's Request For Reconsideration On ANGRY Motion To Adopt Emergency Planning Contentions Abandoned By Mr. Sholly dated February 5, 1981, which was hand delivered to Licensee at 34 N. Court Street, Harrisburg, Pennsylvania, on February 6, 1981, were served upon those persons on the attached Service List by deposit in the United States mail, postage paid, this 6th day of February, 1981.


William G. Miller

Dated: February 6, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE NUCLEAR REGULATORY COMMISSION

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

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