

UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY,)	
et al)	Docket No. 50-320
)	
(Three Mile Island Nuclear)	
Station, Unit 2))	

APPLICANTS' REQUEST FOR EXTENSION OF TIME TO
 FILE MOTION FOR RECONSIDERATION AND
 MODIFICATION OF APPEAL BOARD DECISION
 DATED SEPTEMBER 15, 1982 (ALAB-692)

By its Decision dated September 15, 1982 (ALAB-692) the Appeal Board found, on the bases of probability analyses presented by Applicants and the Staff using air traffic and aircraft crash data through 1977, that the annual probability of a heavy airplane crash on TMI-2 was less than the 10^{-7} guideline set out in the Standard Review Plan. At the same time the Board indicated a need to update the data base periodically in order to determine whether the guideline continues to be satisfied. To this end the Board added two license conditions.

The first of these conditions would adopt a Staff recommendation to modify the present TMI-2 Technical Specifications, which already require Applicants to make an annual report of aircraft operations at Harrisburg, to call for a

breakdown of the number of heavy aircraft operations into scheduled and non-scheduled operations. Specifically, the Staff recommendation adopted by the Board would modify the TMI-2 Technical Specifications to require Applicants to report annually "the total number of movements of aircraft larger than 200,000 pounds (broken down into scheduled and non-scheduled operations), based on a current percentage estimate provided by the airport manager." Applicants have no objection to this modification.

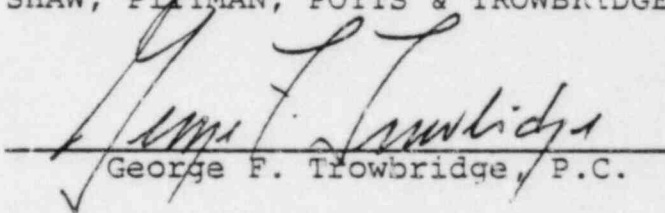
The second requirement imposed by the Board would require Applicants to update their analysis of crash probability utilizing current Harrisburg Airport traffic figures as well as updated national aerial crash density values. The update would be required prior to any return of TMI-2 to operation and every three years thereafter. While the Board requirement applies only to TMI-2, the Board suggests in footnote 61 of the Decision that the Staff may wish to impose a similar requirement in connection with a resumption of operation of TMI-1.

Applicants believe that the Board's objectives can be achieved short of a mandatory full-scale reanalysis of air crash probability requiring collection and analysis of detailed information on national air crashes and their spatial distribution. In Applicants' view such a full-scale reanalysis should be triggered only in the event of a significant change in the key data which dominate the probability determination.

Applicants have requested their consultants to identify such key data and to propose an intermediate calculation which would be used to determine whether a full-scale analysis is necessary. To allow time for the development of this proposal Applicants request an extension of time to November 15, 1982, in which to file a motion for reconsideration of the Board's decision.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE


George F. Trowbridge, P.C.

Dated: October 20, 1982

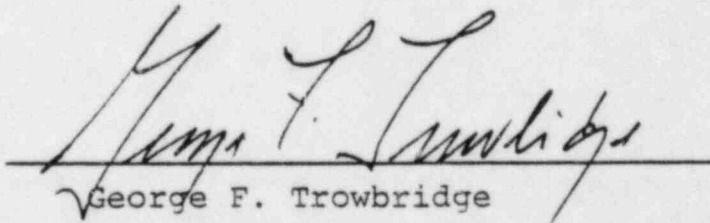
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Request for Extension of Time to File Motion for Reconsideration and Modification of Appeal Board Decision Dated September 15, 1982 (ALAB-692)," were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, or as indicated by asterisk by personal service, this 20th day of October, 1982.


George F. Trowbridge

Dated: October 20, 1982

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SERVICE LIST

*Alan S. Rosenthal, Esq. Chairman, Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555	Karin W. Carter, Esquire Assistant Attorney General Commonwealth of Pennsylvania 505 Executive House P. O. Box 2357 Harrisburg, PA. 17120
*Dr. W. Reed Johnson Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555	Dr. Chauncey R. Kepford 433 Orlando Avenue State College, PA 16801
*Dr. John H. Buck Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555	Atomic Safety and Licensing Appeal Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555
Lawrence J. Chandler, Esq. Office of the Executive Legal Director U.S. Nuclear Regulatory Commission Washington, D.C. 20555	Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555
Docketing and Service Section (3) Office of the Secretary U.S. Nuclear Regulatory Commission Washington, D.C. 20555	