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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

OFFICE OF SECRETARY  
REGULATORY SERVICE  
HARRISBURG

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

UNION OF CONCERNED SCIENTISTS' REQUEST FOR  
EXTENSION OF TIME TO RESPOND TO APPEAL BOARD  
ORDER OF NOVEMBER 5, 1982

On Friday, November 5, 1982, the Appeal Board issued an order setting out its "preliminary views" that the ASLB decision was incorrect with respect to reliance on feed-and-bleed for decay heat removal and soliciting the parties' views on a proposed alternative for dealing with this situation. The parties were directed to respond by Monday, November 15, 1982. UCS hereby requests an extension until November 22, 1982, for the following reasons:

The Commission has scheduled oral argument for November 9, 1982, in Harrisburg, on the question of whether the ASLB decisions in this case should be made immediately effective. Due to the necessity to prepare for and participate in this session we are unable to turn our attention to the Appeal Board Order until Wednesday, November 10.

It further appears to UCS that some time will be required to review the record and to consider several technical questions

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raised by the Appeal Board's Order, for example:

1. the status of training and development of operator procedures for use of the high point vents,
2. the availability of communication between the control room and the location of the efw control valves,
3. the utility of the high point vents in removing steam voids as opposed to noncondensable gases,
4. the availability and utility of instrumentation-- e.g. primary system water level indication--necessary for the operator to determine the need for operation of the high point vents and subsequent operation in the manner suggested by the Appeal Board,
5. the nature and extent of deficiencies in environmental qualification for the efw system and associated instrumentation and controls,
6. the question of whether the new air systems and the manual control of efw valves are safety grade and the protection afforded the individual to be assigned to operate the efw flow control valves.

In addition, UCS believes that it will be necessary to examine material beyond the current record, since there is, so far as we know, no evidence or insufficient evidence on the record with respect to the design of the high point vents and their isolation valves. Such matters would include environmental qualification, assignment of power supplies, sizing of lines and/or orifices, etc.

UCS also believes that it may be necessary to examine the B & W model to determine the effect which its uncertainties may have on these issues.

Because the few days allowed by the Appeal Board order are not sufficient for UCS to address these issues, we hereby request a week's extension, until November 22, 1982, to respond to the Appeal Board Order of November 5, 1982.

Respectfully submitted,

  
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November 8, 1982

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In the Matter of )  
METROPOLITAN EDISON COMPANY )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

'82 NOV 10 AM 11:23  
Docket No. 70-269  
(11/10/82)  
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing UNION OF CONCERNED SCIENTISTS' REQUEST FOR EXTENSION OF TIME TO RESPOND TO APPEAL BOARD ORDER OF NOVEMBER 5, 1982, have been delivered this 8th day of November, 1982, first-class, postage paid, to the following:

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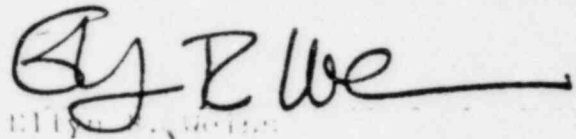
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