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November 30, 1982

The Honorable Nunzio Palladino  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Chairman Palladino:

The Atomic Industrial Forum's Committee on TMI-2 Recovery appreciates the opportunity to comment on the Commission's consideration of lifting the effectiveness of two 1979 orders directing that TMI-1 remain in a cold shutdown condition until further order.

The Committee urges the Commission to lift the two orders. The Committee's position is based on the following considerations:

- o Having completed a protracted and detailed hearing addressing many subjects, the Atomic Safety and Licensing Board (ASLB) has determined that Unit 1 can be operated safely after implementation of specific requirements. In particular;
  - The ASLB completed a detailed review of the competence of the management organization that will be responsible for the safe operation of Unit 1. These findings were favorable to GPU Nuclear and the organizational structure that they have developed to operate and support Unit 1;
  - With regard to the training program, the ASLB concluded that GPU Nuclear has recruited a management staff with outstanding professional credentials and experience to administer the program. The additional board imposed requirements discussed in their partial decision of July 27, 1982 will further support a well conceived and qualified training program.
  - In reviewing the emergency response plans of GPU Nuclear, the State of Pennsylvania and certain surrounding Counties, it was concluded by the ASLB that, subject to the satisfaction of certain conditions set forth in the partial decision, the status of on-site and off-site emergency planning provides reasonable assurance that appropriate protective measures can and will be taken in the event of a radiological emergency at Unit 1;

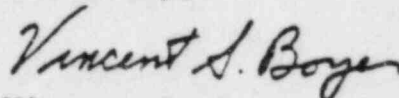
November 30, 1982

- With the proposed changes to be made to the facility, the ASLB found the separation of Unit 1 and Unit 2 acceptable;
- o Operation of TMI-1 would help alleviate the economic constraints currently delaying the safe and timely clean-up of TMI-2;
- o In our Committee functions, the members have met with several of the executives and managers directly responsible for the everyday operation and support of TMI-1. We believe that this management team, working under the new GPU nuclear organization, is in a strong position to direct the safe operation of the plant.

In conclusion, based on the extensive review of topics in the TMI-1 restart hearing, including plant design and procedures, management organization, training, emergency planning and unit separation, and the conclusions drawn from that record, we encourage the Commission to lift its two 1979 orders.

If you, the other Commissioners, or the staff have any questions regarding the Committee's position, I would be pleased to arrange for appropriate meetings with Committee members. A Committee membership list is enclosed.

Sincerely,



Vincent S. Boyer  
Chairman  
Three Mile Island-2  
Recovery Committee

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