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Writer's Direct Dial Number:

October 26, 1984

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Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stolz:

Your letter of October 4, 1984 forwarded copies of an NRC request to FEMA to evaluate TMI-1 Related Emergency Preparedness Communication Drills in Lancaster and Dauphin Counties and a FEMA memorandum evaluation.

Thank you for providing the documents. However, I wish to point out that the purpose of the drills as described in both letters is incorrect.

As discussed by Mr. Giangi of GPU Nuclear in his letter of July 16, 1984 to Mr. Asher of FEMA, the drills were arranged at GPU Nuclear's request with the assistance and cooperation of the NRC, PEPA, FEMA, and the counties to address the Restart Condition Item 2010g (NRC Certification Item No. 144) imposed by the Atomic Safety & Licensing Board. Unfortunately, the FEMA letter of September 26, 1984 measures the results against the broader Category A deficiencies of the November 1983 drill.

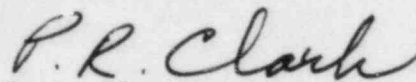
By letter of July 16, 1984, GPU Nuclear provided to the NRC an evaluation of the communication drills against the ASLB findings. We continue to believe that those drills provide adequate basis for the NRC to complete its Certification Item No. 144 on this subject.

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Since we believe that lifting of the 1979 Shutdown Orders for TMI-1 should be resolved on their own merits and independent of resolving any other items (such as FEMA Category A deficiencies), we request that the NRC review this matter giving consideration to the stated purpose of the drill and make a determination relative to satisfying Certification Item No. 144.

Very truly yours,


P. R. Clark
President

pfk

cc: R. L. Long, Director, Nuclear Assurance
R. S. Wilkerson, FEMA Headquarters
R. Zahler, Esq., Shaw, Pittman, Potts & Trowbridge