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822-1084

February 25, 1985

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Mr. Gustave A. Linenberger, Jr.
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In the Matter of
Metropolitan Edison Company
(Three Mile Island Nuclear Station Unit No. 1)
Docket No. 50-289 SP

Gentlemen:

During the remanded hear. on the Dieckamp mailgram issue, Licensee referred to a statement in NUREG-0600

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PDR ADOCK 05000289
G PDR

DBS

Messrs. Smith, Wolfe and Linenberger

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concerning offsite and onsite radiation measurements. Tr. 30,420-22. Licensee intended to rely on this statement to demonstrate, if necessary, that any 3mR/hr reading of which Walter Creitz learned prior to 11:00 a.m. on March 28, 1979, must have been an onsite reading.^{1/} The pertinent part of NUREG-0600 stated:

Radiation levels measured by land-based onsite and offsite teams first began to increase at 1020 on March 28, with an onsite team in the North Parking lot reporting a radiation level of 3mR/hr.

* * *

Offsite radiation levels reported during this period, with the exception of 50 mR/hr measured at 1548 on PA Route-441 about 1500 feet south of northgate . . . , were not above background until 2238 when a radiation level of 13 mR/hr was measured near Kunkel School (5.6 mi. n.w.).

NUREG-0600, JME 1(c)(62) at II-3-81.^{2/}

In preparing Reply Findings, Licensee noted a discrepancy between this statement and Table II-C-1 in NUREG-0600, which records several above background offsite readings after 11:00 a.m. but long before 1548 or 2238 on March 28th. Licensee then reviewed the accident radiation survey log for the 28th and

^{1/} In its proposed findings, TMIA has attempted to establish that before addressing the PaPUC on the day of the accident, Mr. Dieckamp was informed by Mr. Creitz of a 3mR/hr offsite radiation level that allegedly had been measured before 11:00 a.m. Thus, Licensee found it necessary to address this issue in its Reply Findings. See Licensee's Reply Findings, dated February 25, 1985, ¶¶ 30-35.

^{2/} The Report of the Special Inquiry Group similarly stated, "Measured offsite radiation levels generally remained below background levels except for a reading of 50mR/h at 7:48 p.m. on the road east of Unit 2 near the Observation Center." Report of the Special Inquiry Group, Vol. II, Part 3, at 868.

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determined it confirms the NUREG-0600 Table that in fact levels above background were detected offsite shortly after 11:00 a.m. The radiation survey log^{3/} is attached for the Board's information.

It still remains Licensee's position that any 3mR/hr radiation level of which Mr. Creitz learned prior to 11:00 a.m. on the 28th was an onsite level. However, Licensee does not wish to cite a statement in NUREG-0600 that appears to be inaccurate in other respects, or for the Board to be misled. Accordingly, Licensee in its Reply Findings (LIC Reply 32) cites Table II-C-1 of NUREG-0600. This table is in evidence, although it was not noticed for citation by Licensee during the hearing.

In addition, Licensee takes the opportunity to alert the Board and parties to several additional references to the Joint Mailgram Exhibit which were not noticed for citation during the hearing. Licensee found it necessary to cite these references to reply to TMIA's "time gap" theory (TMIA PF 200-202) -- an argument which TMIA raised in its findings. These citations are JME 1(c)(67) at 17, JME 1(c)(62) at I-A-89 and I-A-103, and JME 1(c)(10) at 21. The citations appear at LIC REPLY 39.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

Ernest L. Blake, Jr.

Ernest L. Blake, Jr., P.C.
Counsel for Licensee

Attachment
cc: Service List

3/ This log was produced during discovery, and the second page of the log was admitted into evidence as part of TMIA Mailgram Exh. 32B. The radiation readings of interest here, however, appear on the first page. Because the first page of the log is not in evidence, Licensee has not relied on it in its Reply (even though it may be the best evidence on this point).

Time	Reading (mR/hr)	Grid & Location
1153	< 1	S. end of Island
1155	< 1	Obs. Ctr.
1152	I < MDA $\mu\text{Ci/cc}$	SE-01 along Pt. 441
1152	I < MDA $\mu\text{Ci/cc}$	E-01 Behind Obs. Tr. along Rd.
1141	< 1	E-01
1133	I 7.9 E-8 $\mu\text{Ci/cc}$	(GE-5) on-site boundary east of Unit 2 cooling tower
1000	I 1.6 E-7 $\mu\text{Ci/cc}$	N. Parking Lot
1128	I 2.84 E-7 $\mu\text{Ci/cc}$	(GE-4) site boundary - ca
1129	PART. 9.0 E-8 $\mu\text{Ci/cc}$	warehouse (GE-5)
1123	< 1	SE-01 - along Pt. 441
1116	< 1	South Bridge
1114	< 1	N-01 P.F. Tracks along Pt. 441 near Rept. Lab
1112	< 1	SE-01 Red Hill
1111	3	Tombury Garden Ct.
1110	< 1	Wood 500 KV Sub. & Obs. Ctr.
1109	2.5	Between cooling towers on Pt. 441
1107	2	NE-01 Guyro Church Rd. & Pt. 441
1104	2	(GE-5) on-site boundary east of Unit 2 cooling tower
1048	I < MDA	NE-01 Guyro Church
1104	2	(GE-5) on-site boundary east of Unit 2 cooling tower
1057	7	(GE-4)
1058	< 1	Obs. Ctr.
1048	< 1	NE-01 Guyro Church
1048	3	N. Weather Station
1048	< 1	Obs. Ctr.
1020	2-3	N. Parking Lot
1020	< 1	Turnpike Bridge
1029	< 1	North Gate
1021	3	North Park Lot
1012	< 1	North Park Lot

<u>Time</u>	<u>Readings</u>	<u>Grid & Location</u>
0805	I < MDA uCi/cc	(GE-9) onset
0810	I 1.24 E-8 uCi/cc	WSW-11 South of
0840	I 5.26 E-9 uCi/cc	(GE-8) onset near
0842	L 1	Goldboro Marina
0842	L 1	WSW-11 South of
1232	10	SSS warehouse
1233	7-8	(GE-10) onset - near
1234	L 1	warehouse #1
1234	I 5.98 E-9 uCi/cc	(GE-2) northgate
1250	I 3.54 E-8 uCi/cc	(GE-2) northgate
1315	L 1	obs. Chr.
1318	L 1	ATAU-31 in air over
1316	L 1	airport runway & taxi
1322	4	NW in air over
1327	2-3	Unit 1 air intake
1327	3-4	Unit 1 air intake
1327	2-3	SSS in front of warehouse
1326	4	N. Park. Lot
1322	4	N. Park. Lot
1322	10	St 4 to N. weather St. 400 ft. above
1330	10	Unit 1 cooling tower
1330	20	Unit 2 RR Bldg. 300 ft. above
1348	I 1.71 E-9 uCi/cc	(GE-4) onset - between
1355	3	(GE-2) cooling towers
1358	1	(GE-2) onset near
1405	8-10	N-11 - middle town
1400	3	Unit 1 air intake
1426	I 6.81 E-7 uCi/cc	(GE-2) northgate
1426		SSS in front of warehouse

see previous page for 1012 thru 1153

SE9 Unit 1 air intake

SE9 Unit 1 air intake

SE9 Unit 1 air intake

SE9 Unit 2 RR Bldg.

SE9 Unit 1 air intake

SE9 Unit 2 RR Bldg.

SE9 Unit 1 air intake

1426 MICROCITIMED

foxes in middle town

1445	<1	Middletown Swim Club
1453	30 mr/hr	GE-2
1458	I 1.43 E-9 uCi/cc	Middletown Swim Club
1403	I 3.5 E-9 uCi/cc	
1427	I 1.22 E-8 uCi/cc	N. Middletown Square
1541	70	GE-2
1556	8	GE-2
1547	20	approaching north gate
1547	12	GE-2 north gate
1548	50	on Rt. 441 opposite GE-2
1545	<1	Tri-County Boat Club
1541	70	GE-2
1544	3	1/4 mi south of old smoking on 441
1545	150	front of service bldg. - outside
1600	<1	- north gate -
1605	<1	- north gate -
1611	80	Front of service bldg.
1615	50	GE-2 north gate
1601	I 2.02 E-7 uCi/cc	GE-2
1640	45	Inside service bldg. on Unit 1
1601	I 2.27 E-9 uCi/cc	NNE of
1645	55	outside service bldg. - Unit 1
1650	<1 mr/hr	N 21 Middletown
1720	<1 mr/hr	N 11 Royalton
1720	140	GE-10
1720	210	Between GE1 and GE-10
1730	40	GE-1
1735	<1	N 11 -

GE1/ROUJIM

<u>Time</u>	<u>Reading</u>	<u>Grid & Location</u>
1730	35 MF/HR	Front of Service BLDG outside
1653	9.57 E ⁻⁹	N-21
1719	2.269 E ⁻⁹	N-11
1815	< 1 MF/HR	N. GATE to Ob. Center
1820	NON-detectable (MF/HR)	R+ 441 / M town & S. Union St
1825	< 1 MF/HR	N. GATE
1825	NON-detectable (MF/HR)	441 & RR TRACKS
1830	13 MF/HR	Service BLDG GE-2
1830	26 MF/HR	N. GATE at Yield Sign
1830	0.5 MF/HR	N. GATE
1835	< .05 MF/HR	N. GATE
1830	< .05	Tri County Boat Club
1835	< 1	Along 230
1915	< 1	Across Bridge from N. Gate
1915	< .05	Tri County Boat Club
1916	< 1	GE-1
1917	12	Between GE-1 & GE-10
1917	10	GE-10
1920	20.	Behind Warehouse
1920	3	GE-9
1923	< 1	South from UI Mech Draft Cooling tower
1940	9	RMA 5
1943	20-2 25 closed 42 open	Behind Warehouse
2115	5.2 x 10 ⁻⁷ μ g I ¹³¹ /cc	(behind) W of Warehouse

MICROFILMED

Time Reading Grid & Location

2010 RO-2 closed 14' Inside Warehouse
open 26

2015 RO-2 closed 15' outside warehouse
open 20

2030 .03 B-8 mr/hr: Olmsted no word.
2030 I < MDA

2130 RO-2 closed 200 mr/hr N-Warehouse

2130 RO-2 open 300 mr/hr N-Warehouse

2238 13 mr/hr
2225 12 mr/hr
300 3 mr/hr
Kunkel School (Fulling Mill Pond)
across Susq. from Olmsted
LongView Acres (NNW)

2315 < 1 mr/hr
2315 6 mr/hr
2320 < 1 mr/hr
North Gate
Ebenezer Church - 441
Host Inn - 441

2320 RO-2 open 30
closed 20
2325 open 365
closed 504
2330 10 Gamma mr/hr
2335 1 mr/hr
GE-1
GE-10
GE-9
GE-8

2337 1.5 mr/hr South End Island
2350 3 mr/hr Olmsted Plaza no word.

2005 3/20/11 < 1 mr/hr Fulling Mill 441 to H.S.
< 1 mr/hr Union St.

2005 3/20/11 3.5 mr/hr North Gate

$$I = \frac{\text{Counts}}{(\text{Eff}) (\text{Vol.}) (2.22 \text{ EG})}$$
$$(\text{.034}) (4.25 \text{ EG})$$

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 Remand
(Three Mile Island Nuclear)	on Management)
Station, Unit No. 1))	

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