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Metropolitan Edison Company
Post Office Box 480
Middletown, Pennsylvania 17057
717 944-4041

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October 9, 1979

Dr. Joseph Hendrie
Chairman
Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Hendrie:

Mr. Arnold's letter of October 1, 1979, to Mr. Vollmer of your staff provided an assessment of alternatives to the prompt operation of the EPICOR II System and recommended NRC authorization of the use of EPICOR II by October 15, 1979. Your staff has concluded, in its environmental assessment of the operation of EPICOR II, that operation of the system can be conducted in full compliance with the Commission's regulations. We strongly recommend the use of EPICOR II and the retention of Unit 1 storage capacity for emergency use only.

There exists in the wake of the Three Mile Island Unit 2 accident a public skepticism and concern surrounding the contaminated material in TMI-2. The aura that some have attached to the TMI-2 radioactive waste, separate from all other radioactive materials, is without sound technical merit. Yet, despite the lack of technical justification, some continue to portray the Unit 2 contamination as different and as requiring different standards. Commission action to date has not dispelled this concern.

Failure to authorize EPICOR II because of the availability of Unit 1 storage capacity will only delay the inevitable requirement for action. At the same time it will further spread Unit 2 contamination to Unit 1 and thereby burden all activities at the site with the technical, political, and psychological factors associated with the Unit 2 radioactive materials. The end result can only be to impede future decisions which will be necessary to protect the health and safety of the public.

The transfer of Unit 2 radioactive materials to Unit 1 is contrary to paragraph 4 of the Commission's August 9, 1979, order which states:

> The licensee shall demonstrate that decontamination and/or restoration operations at TMI-2 will not affect safe operations at TMI-1. The licensee shall provide separation and/or isolation of TMI-1/2 radioactive liquid transfer lines, fuel handling areas, ventilation systems, and sampling lines. Effluent monitoring instruments shall have the capability of discriminating between effluents resulting from Unit 1 or Unit 2 operations.

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To date the perceived and the demonstrated problems peculiar to Unit 2 contaminated materials have not infringed on activities in Unit 1. We are convinced that this should remain the case. We urge you to take these factors into account as well as the environmental assessment of your staff, the summary of alternatives contained in Mr. Arnold's letter, and the availability of EPICOR II which has been constructed and can be operated in compliance with applicable Commission standards.

We must emphasize that our ability to discharge our ongoing responsibilities is critically dependent upon the availability of Commission approved and supported standards for design, construction, operations, radiological controls and administration controls for nuclear facilities. We urge the Commission to evaluate and to authorize the use of EPICOR II on the basis of established standards. To do otherwise would reinforce the unfounded opinion of those who suggest that the existing Commission standards are inadequate to protect the health and safety of the public.

Sincerely,

H. Dieckamp
President (acting)

clb

cc: Commissioners Victor Gilinsky
Richard T. Kennedy
Peter A. Bradford
John F. Ahearne
Mr. Harold R. Denton