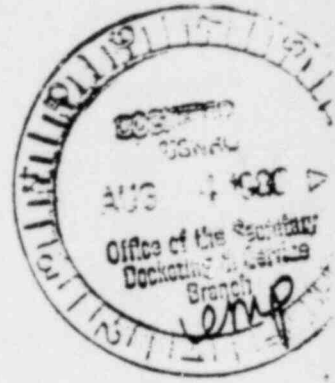


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

REVISION OF TMIA CONTENTION 6

10 CFR 50.40, 10 CFR 50.57 and 10 CFR 50 Appendix C require Licensee to prove that it is "financially qualified to engage in the proposed activities in accordance with the regulations in this chapter." Particularly, 10 CFR 50.33 requires Licensee to show that it "possesses or has reasonable assurance of obtaining funds necessary to cover the estimated cost of operation for the period of the license or for five years, whichever is greater, plus the estimated costs of shutting the facility down and maintaining it in a safe condition."

TMIA contends that the TMI-2 accident and its aftermath have placed Licensee in a severely weakened financial position -- such that Licensee and its parent, GPU Corporation, are unable to attract the necessary capital at reasonable rates to finance necessary capital expenditures at both TMI-2 and TMI-1, while simultaneously meeting their obligations elsewhere. Such an inability to acquire necessary capital, particularly given the ever-increasing estimates for the cost

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of clean-up at TMI-2, makes it questionable, at best, whether Licensee could adequately respond financially to any substantial unanticipated occurrences at TMI-1. Further, it is problematical at this time as to whether Licensee will be able to respond adequately to presently known financial needs at TMI-1 and TMI-2. Without very substantially increased rates and government financial assistance, both of which cannot reasonably be predicted to occur in the near future, Licensee cannot and does not meet the requirement that it be financially qualified to operate a nuclear plant.

TMIA will rely, in supporting this contention, upon the financial information already submitted or to be submitted by Licensee in this proceeding and financial reports and information submitted in past as well as present Pennsylvania PUC proceedings, the GAO report entitled Three Mile Island: The Financial 'allout, and standard market analyses available to the general public, including Standard and Poors, Moody's Investor Services, Saloman Brothers and other similar publications. TMIA intends to submit the analysis of an expert witness who has evaluated this information.

Respectfully submitted,

WIDOFF, REAGER, SELKOWITZ & ADLER, P.C.

By: 

Mark P. Widoff

P. O. Box 1547
Harrisburg, PA 17105
(717) 763-1383

Dated: July 31, 1980

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing document, Revision of TMIA Contention 6, to be placed in the United States mail, first-class, postage prepaid, addressed to the persons listed below:

Ivan W. Smith, Chairman
Atomic Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

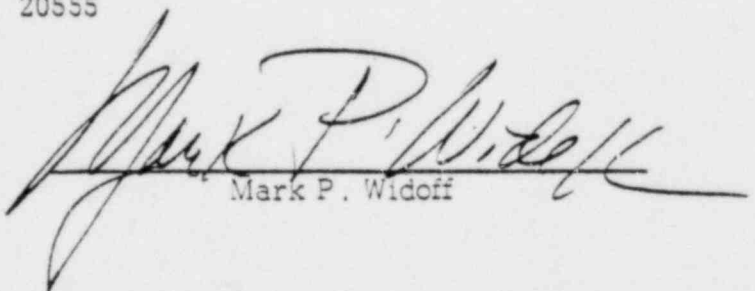
Dr. Walter H. Jordan
881 West Outer Drive
Oak Ridge, TN 37830

Dr. Linda W. Little
5000 Hermitage Drive
Raleigh, NC 27612

George F. Trowbridge, Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, DC 20006

Docketing and Service Section
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555


Mark P. Widoff

Dated: July 31, 1980