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April 30, 1985

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

LICENSEE'S COMMENTS ON
AMENDMENT TO AAMODT MOTION
OF JANUARY 15, 1985

In a document entitled "Amendment to Aamodt Motion of January 15, 1985 Additional Health Matters Which Must be Considered Prior to the Commission's Decision on Restart of Unit 1" and dated April 13, 1985,^{1/} the Aamodts have submitted additional input to the Commission on the subject of their earlier January 15, 1985 motion. The Amendment includes argument on Licensee's integrity. Licensee provides the following comments on that aspect of the Aamodts' Amendment which postulates that Licensee and the NRC knew in 1980 that the accident had been more severe than was publicly stated.

The Aamodts assert that it was known in 1980 that core temperatures exceeded 5000 degrees Fahrenheit when

1/ Licensee was served by mail on April 15, 1985. See "Errata -- Amendment to Aamodt Motion of January 15, 1985" (undated).

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transuranics from the core were observed on filters. Aamodt Amendment at 17. The Aamodts further submit it was recognized at the same time that transuranics which are alpha emitters could have been released to the environment during the accident but such information was withheld. Id. at 17-18. There are a number of fallacies in the Aamodt assertions.

First, belief that temperatures in excess of 5000 degrees occurred during the accident has only recently been posited. That proposition has been the subject of press statements in February, 1985 and discussed openly, for example, with the TMI-2 Advisory Panel in a public meeting on April 11, 1985. Although after the accident it was recognized that temperatures in the core had been very high, the quantifications were stated, for example, as "may have exceeded 4000°F." See Technical Staff Analysis Report on Core Damage to President's Commission on the Accident at Three Mile Island, Summary and Findings at 1. It was further widely recognized that knowledge about what actually occurred in the core would necessarily progress with further analyses and actual inspection of the reactor fuel itself. See id. at 2. That is simply all that has occurred now -- with additional work and inspection of the core, knowledge has increased.

Second, the Aamodts' Amendment exhibits considerable confusion concerning transuranics. That transuranics existed outside the fuel following the accident is not new news. The

identification and quantification of transuranics was described openly. See, for example, Licensee's letter (R. C. Arnold) to NRC (R. Vollmer) of September 13, 1979 (providing the results of an August, 1979 reactor building sump water sample). The fact that transuranics were identified outside the fuel after the accident does not, however, necessarily translate into knowledge of the severity of the accident. On information and belief, transuranics may be released into the coolant when the fuel cladding is breached whether from cracking or other failure of the clad; trace quantities can be found in operating reactors. The damage which the TMI-2 core sustained was not quantifiable merely by virtue of the identity of transuranics outside the fuel.

Finally, contrary to the Aamodts' assertion that 6000-22,000 lbs. of core material is missing, this material is not missing but is contained principally in the Reactor Coolant System (RCS) and supporting systems as shown in the Aamodts' own Exhibit 5. Estimates of the distribution of core material have been recently revised as discussed publicly with the TMI-2 Advisory Panel on April 11, 1985, providing a better estimate of where and how much of this core material is located within the RCS and supporting systems. Thus, the Aamodts' further implication that transuranics contained in the "missing" tons of core material were discharged directly to the environment is incorrect. The Aamodt argument that this is shown by having observed transuranics on filters in 1980 is still further

flawed. These filters in question are part of the Makeup System of the RCS and not ventilation filters to the atmosphere or discharge filters to the river.

In short, the Aamodts' misdirected allegations of cover-up lack foundation.

Respectfully submitted,

Ernest L. Blake, Jr.

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

April 30, 1985

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NUCLEAR REGULATORY COMMISSION

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METROPOLITAN EDISON COMPANY
(Three Mile Island Nuclear
Station, Unit No. 1)

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) BRANCH
)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Comments on Amendment to Aamodt Motion of January 15, 1985", dated April 30, 1985, were served on those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 30th day of April, 1985.

Respectfully submitted,

Ernest L. Blake, Jr.
Ernest L. Blake, Jr. P.C.

DATED: April 30, 1985

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