

FOI/PA REQUEST

From: [REDACTED]
 To: <FOIA@nrc.gov>
 Date: Fri, Feb 17, 2006 3:23 PM
 Subject: FOIA Request for the "Safety Analysis Report for Transition to Natural Circulation," by Licensee of the Three Mile Island Unit-2 Reactor, April 12, 1979.

Case No.: 2006-0120
 Date Rec'd: 2-17-06
 Specialist: Breyer
 Related Case:

Freedom of Information Act Officer
 United States Nuclear Regulatory Commission
 Washington, D.C.

I am a Citizen of the United States of America, and make research of the accident hazards of nuclear power plants. I assume that the library of the NRC has a copy, and probably several copies, of my treatise The Accident Hazards of Nuclear Power Plants (University of Massachusetts Press, 1976). I am finishing research of the Three Mile Island nuclear accident of March 28, 1979, and there is one particular document which I need urgently. I request your help in obtaining a copy of it.

It is a safety analysis report submitted to the U.S. NRC in April 1979 by the licensee of the Three Mile Island Unit-2 reactor -- the reactor that suffered the accident at TMI. The document ought to be in the NRC's file for the TMI-2 reactor Docket 50-320. The document is titled"

Safety Analysis Report for Transition to Natural Circulation, issued by Metropolitan Edison, April 12, 1979.

However, I have been informed by the Public Documents Room of the NRC that their microfiche file for that Docket 50-320 does not include the document; though the file includes the letter of the licensee which accompanied and submitted the safety analysis report at the request of the NRC. That letter is a Proof of the existence of this "Safety Analysis" by Metropolitan Edison. The letter is also dated April 12, 1979, and has the Accession Number 7905190236 -- a one page letter from J.G. Herbein of the Metropolitan Edison Co., titled, "Forwards safety analysis report proposed transition to natural circulation as requested at NRC 790409 meeting. Long-term natural circulation is viable for stability., with a "document/report number GQL-0509, GOL-509, physics location ADOCK-05000320-P-790412, PDR: ADOCK/05000320/P790412, microform address: 00137:312-00137:312.

So, the Safety Analysis Report was in fact given to the NRC, and therefore should be contained in the TMI-2 docket file. Also, I know that the document exists, since it is cited in an article which I wrote and which was published by Stackpole Books of Harrisburg, Pa., in 1980. The book, Nuclear Lessons. In that book, as an "Afterword," is my article, titled, "Analysis of the Three Mile Island Accident." I refer to page 263.

I have sent a letter to Dr. Carl Paperiello, Director of Research in the NRC, requesting that his officer investigate the whereabouts of that MetEd Safety Analysis, and secure it back into the microfiche files of the NRC. I am attaching a copy of my letter to Dr. Paperiello. I am appealing to your FOIA office for the document inasmuch as Dr. Paperiello wrote me some days before I sent him my letter "suggesting" that if I want any document, to apply for them through your office. However, I believe that the FOIA was intended not as a routine document provider for the public, but only for such cases when the proper officer of the NRC refuses to cooperate and provide a document. I am hoping that Dr. Paperiello will perceive the importance and necessity of finding that document, and making it available for research. The urgency of the matter which I judge it, requires that I ask your office as well, and propose that both your office and Dr. Paperiello's office work together to find the document.

It is a fundamentally important document. I request the privilege of the most expeditious search for the document.

Respectfully submitted,
 Richard E. Webb

[REDACTED]

**Studies of Nuclear Hazards
and Constitutional Law**

Richard E. Webb, Ph.D.



Dr. Carl J. Paperiello, Director
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Rockville, Md. by telefax, 301-415-5153

16 February 2006

Dear Dr. Paperiello,

Subject: The TMI-2 Licensee's *Safety Analysis Report for Transition to Natural Circulation* during the Three Mile Island Unit-2 Reactor Accident — a vitally important, but missing Document.

The NRC's Public Documents Room office has informed me that they do not have the document, *Safety Analysis Report for Transition to Natural Circulation*, issued by Metropolitan Edison, April 12, 1979. This document ought to be in the NRC file for the TMI-2 reactor license docket, number 50-320. This document contains the TMI-2 licensee's technical analysis and justification for their then proposed trial of natural circulation for cooling the TMI-2 reactor during its accident in March-April 1979.

The TMI-2 licensee was assisted during the TMI-2 reactor accident by a group of experts from around the country, called the Industry Advisor Group, and therefore, I think that it is likely that members of that IAG had advised and assisted the licensee, then Metropolitan Edison and GPU, on the matter of that Safety Analysis for natural circulation cooling. I have judged that that document is a vital document recording important information on the states of the reactor during the time interval from the about 18 hours into the accident to the date of that Safety Analysis report, April 12, 1979, and revealing the perception, understanding, and assumptions of the licensee and perhaps also their advisors and the IAG assistants, of the condition and changing conditions of the reactor during that critical period. Therefore, I having been seeking a copy of that important document.

I request your office to investigate the whereabouts of this document, and do what is necessary to secure the authentic original or copy, and enable me and other citizens then to obtain a copy of that.

Sincerely yours,

Richard E. Webb

P.S. My telefax machine is now restored, and can both receive and send
faxes.

