

NRC (2-76)		U.S. NUCLEAR REGULATORY		SSION	DOCKET NUMBER 50-289		
NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL					FILE NUMBER		
TO: Mr Rusche		FROM: Gen Public Utilities Corp New York, NY H Diencamp		DATE OF DOCUMENT 9-20-76			
				DATE RECEIVED 9-28-76			
<input checked="" type="checkbox"/> LETTER <input checked="" type="checkbox"/> ORIGINAL <input type="checkbox"/> COPY		<input checked="" type="checkbox"/> NOTARIZED <input checked="" type="checkbox"/> UNCLASSIFIED		PROP	INPUT FORM		
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DESCRIPTION Ltr notarized 9-20-76....furnishing info concerning proceedings involving Met. Edison Co.... ORIGINALLY CONTROLLED UNDER MER #1198. PLANT NAME: Three Mile Island #1			ENCLOSURE <div style="text-align: center; font-size: 1.2em;"> ACKNOWLEDGED DO NOT REMOVE 1488 350 </div>				
SAFETY		FOR ACTION/INFORMATION		ENVIRO 9-28-76 ehf			
<input checked="" type="checkbox"/> ASSIGNED AD: <input checked="" type="checkbox"/> BRANCH CHIEF: <input checked="" type="checkbox"/> PROJECT MANAGER: <input checked="" type="checkbox"/> LIC. ASST.:		<i>Reid</i> <i>Zeitig</i> <i>Ingram</i>		ASSIGNED AD: BRANCH CHIEF: PROJECT MANAGER: LIC. ASST.:			
INTERNAL DISTRIBUTION							
<input checked="" type="checkbox"/> REC FILE <input checked="" type="checkbox"/> NRC PDR <input checked="" type="checkbox"/> I & E <i>192</i> <input checked="" type="checkbox"/> OELD GOSSICK & STAFF MIPC CASE HANAUER HARLESS PROJECT MANAGEMENT BOYD P. COLLINS HOUSTON PETERSON MELTZ HELTEMES SKOVHOLT		SYSTEMS SAFETY HEINEMAN SCHROEDER ENGINEERING MACCARRY KNIGHT SIHWEIL PAWLICKI REACTOR SAFETY ROSS NOVAK ROSZTOCZY CHECK AT & I SALTZMAN RUTBERG		PLANT SYSTEMS TEDESCO BENAROYA LAINAS IPPOLITO KIRKWOOD OPERATING REACTORS STELLO OPERATING TECH. EISENHUT SHAO BAER BUTLER GRIMES		SITE SAFETY & ENVIRO ANALYSIS DENTON & MULLER ENVIRO TECH. ERNST BALLARD SPANGLER SITE TECH. GAMMILL STEPP HULMAN SITE ANALYSIS VOLLMER BUNCH J. COLLINS KREGER	
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<input checked="" type="checkbox"/> LPDR: <i>Harrisburg, Pa</i> <input checked="" type="checkbox"/> TIC: <input checked="" type="checkbox"/> NSIC: <input checked="" type="checkbox"/> ASLB: <input checked="" type="checkbox"/> ACRS / 6 CYS <i>HOLDING SENT TO LA Ingram</i>		NAT LAB: REG. VIE LA PDR CONSULTANTS		BROOKHAVEN NAT LAB ULRIKSON (ORNL) <div style="font-size: 1.5em; text-align: center;"> 9852 </div>			

FROM: H. Dieckamp General Public Utilities Corp. 80 Pine Street New York, NY 10013-5		DATE OF DOCUMENT 9/20/76	DATE RECEIVED 9/22/76	NO. NRR-1198
TO:		LTR.	MEMO	REPORT
CLASSIFICATION: POST OFFICE REG. NO.		FILE CODE		
DESCRIPTION: (Number Box Unchecked) Re copy of response from NRC to The Environmental Coalition on Nuclear Power re Three Mile Island.		REFERRED TO RBoyd	DATE 9/23/76	RECEIVED BY ORIGINAL INCOMING LETTER SENT TO DOCKET FILE FOR PROPOER DISTRIBUT
ENCLOSURES:		Copy to:		
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		PDR - 50-320		
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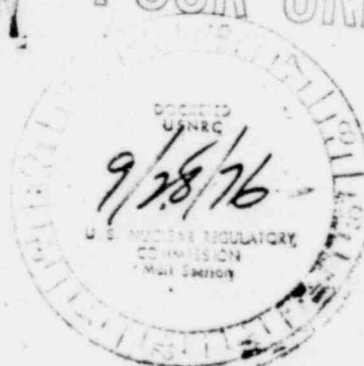
U. S. NUCLEAR REGULATORY COMMISSION

MAIL CONTROL FORM

FORM NRC 328 (1-75)

REGULATORY DOCKET FILE COPY

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General Public Utilities

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POWER
COMPANIES

Corporation

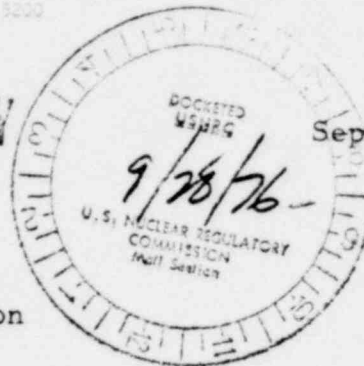
AND SUBSIDIARY ELECTRIC POWER

COMPANIES

Jersey Central Power & Light Company • Metropolitan Edison Company • Pennsylvania Electric Company

30 RINE STREET NEW YORK, N. Y. 10003 • TELEPHONE 747-8200

REGULATORY DOCKET FILE COPY
OFFICE OF THE PRESIDENT



September 20, 1976

Mr. Ben C. Rusche, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Metropolitan Edison Company, Jersey Central
Power and Light Company, Pennsylvania Electric
Company (Three Mile Island Nuclear Station, Unit No. 1)
Docket No. 50-289

Dear Mr. Rusche:

By letter dated September 8, 1976 to Mr. R. C. Arnold of Metropolitan Edison Company, you forwarded a copy of a request you received from an unincorporated organization in Pennsylvania called The Environmental Coalition on Nuclear Power that the Nuclear Regulatory Commission immediately halt operation of Unit 1 of the Three Mile Island Nuclear Station (TMI-1). Your letter stated that you are treating the Coalition's complaint as a request of your office to issue an Order to Show Cause why TMI-1's operating license should not be suspended and that you were affording the licensee ten days to respond with comments on the Coalition's petition before taking action on that request. These comments are made in response to your letter on behalf not only of Metropolitan Edison Company, but of Jersey Central Power & Light Company, Pennsylvania Electric Company and General Public Utilities Corporation (GPU), the parent company of the three operating utility licensees of TMI-1.

GPU and its subsidiaries serve about one half the land area of Pennsylvania and New Jersey with a population of about 4,000,000 including about 1,500,000 customers. We have been involved in the licensing, construction, and operation of nuclear power plants since the early 1960's. Over these years we have respected the Commission's objectives and requirements and have abided by the procedural rules, all the time observing the vast growing potential for procedural complications in licensing. The increased potential for procedural gamesmanship by those who seek at each turn to take total advantage of the Commission rules has, in our view, expanded all out of proportion to any conceivable worth. The concern I express is not solely of a utility management hectored by a minute segment of the public supposedly acting in that public's behalf, but is expressed as well on behalf of the public at large who as customers stand to suffer significant economic penalties if the few are permitted to exploit the licensing system.

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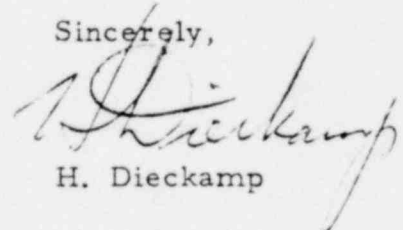
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Three Mile Island Unit No. 1 currently provides about 13 per cent of the GPU System total power needs. Granting the Coalition's request and curtailing TMI-1's continued operation means that GPU's customers will bear increased fuel and interchange power costs of about \$9.5 million a month while this vital unit is shut down. These sums are real cost increases which translate into an additional economic burden to the GPU System equivalent to \$6.40 per month for each customer. Coupled with this burden are the impacts of reduced reliability of the power supply for the seven million customers of the Pennsylvania-New Jersey-Maryland (PJM) interconnection of which TMI-1 is an integral part. In addition, each month that TMI-1 is shut down would require about 770,000 barrels of oil for replacement power, assuming that at least 90 per cent of it comes from oil-fired generation.

Balanced against these costs is the benefit that would be achieved by such a shutdown. Since the fuel in TMI-1 has been operated, it is already radioactive and must be handled as spent fuel regardless of whether or not TMI-1 is operated over the next three months. The costs of ultimate processing and handling are therefore not altered and the only benefit attributable to the shutdown is the quantity of waste not produced, which quantity is negligible in comparison to the nation's inventory of such wastes.

Coalition's request--that operation of Unit 1 be suspended pending public hearings, principally to consider the impact of recent court decisions which found inadequate the Commission's basis for treatment in reactor licensing proceedings of the environmental impacts associated with disposition of nuclear fuel after it is removed from reactors--is opportunism. No rational weighing of the public's interests in avoiding large, clearly definable economic penalties against the disproportionate significance of the generation of a minute addition to the inventory of radioactive wastes supports Coalition's request for suspension. I urge you to judge the instant request by this group in perspective and to reject Coalition's irresponsible attempt to exploit your licensing procedures.


Sincerely,



H. Dieckamp

lda

Subscribed and sworn to before me, a notary public in and for the County of Morris in the State of New Jersey, this 20th day of September 1976.


ALICE J. HOUSE
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires March 7, 1980

1488 353

cc: Judith H. Johnsrud
Chauncey Kepford