

October 15, 1979

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of  
METROPOLITAN EDISON COMPANY,  
et al.,  
(Three Mile Island Nuclear  
Station, Unit No. 1)

Docket No. 50-289

AMENDMENT TO INTERVENTION

On September 18, 1979, the Atomic Safety and Licensing Board announced procedures for filing petitions and amendments to intervene prior to the opening of Three Mile Island, Unit 1. The final date for amendments was listed on Page 2 as October 22, 1979.

When I originally petitioned the Nuclear Regulatory Commission to intervene, I was not aware of so many ground rules. Therefore, this is an amendment to my original intervention and a specific request to alter the response from the Atomic Safety and Licensing Board indicating there would be "no objection" to my intervention pursuant to 10 C.F.R. 2.715 (a) by Metropolitan Edison Co. (limited appearance).

The purpose of my petition to intervene is not emotional rhetoric but to present before the Board relevant and substantiated evidence prior to the rendering of a final decision for reopening Unit 1. Therefore, it is vital that my status be altered from 10 C.F.R., 2715 (a) (limited appearance) to 10 C.F.R. 2.714 (a) (litigation).

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October 15, 1979

Petition to intervene pursuant to 10 C.F.R. 2.714 (a) instead of 10 C.F.R. 2.715 (a). (please note this request for change).

Request to intervene flows from Section 189 (a) of the Atomic Energy Act, 42 U.S.C. 2239 (a) that requires the Commission to admit as a party "any person whose interest may be affected by the proceeding." Pursuant to this, I wish to intervene on behalf of myself on the following contentions:

1. I reside within three miles of Three Mile Island.
2. Medical and Environmental information indicating the feasibility or prudence of pursuing the operation of nuclear power at the Three Mile Island Station.
  - a) Birds
  - b) Farm Animals
  - c) Plant Life
3. Malfunctions of Unit 1 prior to the Unit 2 accident.

I will take the position that any resumption of nuclear power plants in the vicinity of Three Mile Island will intensify the on-going detrimental effects on the environment and animals. These adverse conditions will increase the degenerating health problems for the animals and eventually affect the human populous in the same area.

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*Jane Lee*  
Jane Lee

R.D. 3, Box 3521  
Etters, PA 17319  
717 - 938-6628

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October 15, 1979

The foregoing facts are true and accurate to the best of my knowledge and belief.

SUBSCRIBED AND SWORN TO BEFORE ME  
ON:

INTERVENOR

DATE: October 15, 1979

DATE: Oct 15 1979

Sandra L. Schrader  
SIGNATURE SANDRA L. SCHRADER, Notary Public  
Fairview Twp., York County, Pa.  
My Commission Expires Sept. 20, 1981

Jane Lee  
SIGNATURE Jane Lee

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the attached Jane Lee Petition/Amendment to Intervene by first class U.S. Mail, postage prepaid, to the following:

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
ATT: Chief, Docketing & Service Section

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

George F. Trowbridge, Esquire  
Shaw, Pittman, Potts and Trowbridge  
1800 M. Street, N.W.  
Washington, D.C. 20036



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I, Jane Lee ..... of..... R.D. 3, Box 3521, Etters, PA 17319 .....

do hereby request permission of the Secretary of the United States Nuclear Regulatory Commission to participate in testifying at the TMI - I hearings tentatively scheduled for February 1, 1980.

My request is based on medical and environmental information garnered by me over a three year period. This information/reports, signed by all those involved, encompasses farms within a five-mile radius of TMI. The Veterinarian, who services this area as well as a three-county area, can confirm these occurrences.

Because most of these findings occurred prior to the accident of Unit 2, it is my thought that perhaps nuclear power plants are emitting more than just radiation and therefore are affecting the wildlife, livestock and the environment itself.

Living on a farm has taught me how precious all life is. We are all dependent on each other. When the animals begin to weaken and fall, when the birds begin to disappear, when the smaller animals begin to reveal reproductive problems, this eventually threatens the survival of man. Due to these and other occurrences, I respectfully request time to submit this information to the NRC Panel selected for the purpose of deciding the continued operation of Unit 1 at TMI.

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Jane Lee

R.D. 3, Box 3521

Etters, PA 17319

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of

METROPOLITAN EDISON COMPANY, ET AL.

(Three Mile Island Unit No. 1

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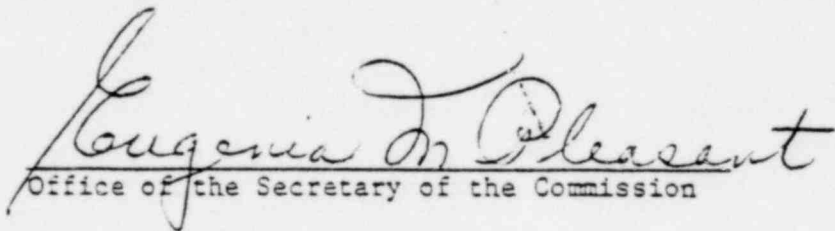
Docket No. 50-289

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document(s) upon each person designated on the official service list compiled by the Office of the Secretary of the Commission in this proceeding in accordance with the requirements of Section 2.712 of 10 CFR Part 2 - Rules of Practice, of the Nuclear Regulatory Commission's Rules and Regulations.

Date, at Washington, D. C. this

15th day of October 1979.

  
Office of the Secretary of the Commission

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of

METROPOLITAN EDISON COMPANY, ET AL.

(Three Mile Island, Unit 1)

Docket No. (s) 50-289

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