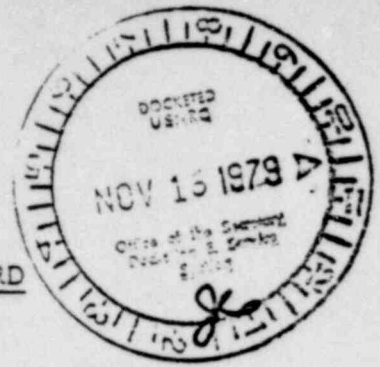


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

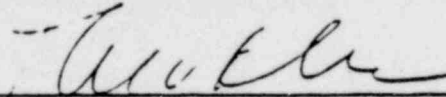


In the Matter of)
)
METROPOLITAN EDISON COMPANY) Docket No. 50-289
) (Restart)
(Three Mile Island Nuclear)
Station, Unit No. 1))

REVISED CONTENTION 4

It is contended that if TMI-1 is restarted, demonstrations will occur that will threaten the security of the entire Island, thereby presenting a clear and present danger to both TMI-1 and the damaged TMI-2 reactors. Local and State authorities are not trained nor equipped to deal with these types of civil disruptions, nor do they have the financial resources to become so equipped and trained. Licensee has not developed any plans to deal with the specialized nature of such civil disruption. If the security of TMI-1 or TMI-2 were breached, the consequences would be the release of high levels of radiation into the air and water, causing sickness and death. It is contended that it will be virtually impossible to secure the integrity and insure the safety of TMI-1 and TMI-2 when widespread civil disruption occurs.

Respectfully submitted,



Theodore A. Adler

Widoff, Reager, Selkowitz & Adler, P.C.
P. O. Box 1547
Harrisburg, PA 17105
(717) 763-1383

1596 117

Dated: November 13, 1979

7912170

070

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))	

SERVICE LIST

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

Dr. Walter H. Jordan, Member
Atomic Safety and Licensing Board
881 West Outer Drive
Oak Ridge, TN 37830

Dr. Linda W. Little, Member
Atomic Safety and Licensing Board
5000 Hermitage Drive
Raleigh, NC 27612

James A. Tourtellotte, Esquire
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

George F. Trowbridge, Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, DC 20036



1596 118