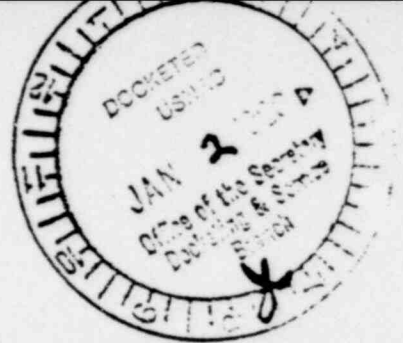


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



TO: Ivan W. Smith, Chairman
Dr. Walter H. Jordan
Dr. Linda W. Little

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

EXCEPTIONS OF TMLA, INC.
TO FIRST SPECIAL PREHEARING
CONFERENCE ORDER

TMIA, Inc., by its attorneys, Widoff, Reager, Selkowitz & Adler, P.C., files the following exceptions to the Board's First Special Prehearing Conference Order.

1. The Board Order referred to herein rejects TMIA Contention No. 4 for the ostensible reason that it is without basis.

2. The assumptions inherent in the contention, and which are noted in the Board's Order, provide the necessary basis by which this Contention may be considered.

3. This Board admits, in its Order, that a group of demonstrators might very well seek to invade Three Mile Island if TMI-1 is reopened. This

proceeding, in accordance with the Commission's Order of August 9, 1979, must consider whether the Licensee will be able to deal with this contingency in a safe and thorough manner.

4. This Board further states that "settled and traditional governmental assistance" will protect the plant. This statement has no basis. In fact, it is contended that there is presently no coordinated law enforcement plan involving Federal, State and local law enforcement agencies to deal with such threats to security.

5. In its Order, this Board states that TMLA, Inc. assumes that TMI-1 would not be shut down safely in the event of a breach of security, but, the Board continues, TMLA, Inc. provides no basis for that assumption. To the contrary, the Contention seeks to present evidence that TMI-1 could very well experience a difficult and unsafe shutdown in the event of widespread civil disruption. Furthermore, Licensee must demonstrate that there is a coordinated plan to protect the Island that takes into account the very unusual and dangerous situation presently existing at Three Mile Island. Assurances by the Licensee that it will comply with all necessary security requirements imposed by the Commission without any public discussion of the problems inherent in such plans is not consistent with accepted concepts of administrative law nor with the intent of the Commission's Order of August 9, 1979.

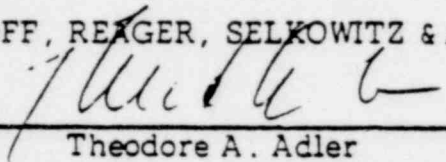
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WHEREFORE, TMIA, Inc., takes exception to this Board's Order rejecting Contention No. 4, and hereby requests a reinstatement of that Contention for the reasons set forth herein.

Respectfully submitted,

WIDOFF, REAGER, SELKOWITZ & ADLER, P.C.

By:


Theodore A. Adler

Dated: December 26, 1979

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CERTIFICATE OF SERVICE

I do hereby certify that I served a true and correct copy of the foregoing document on the below listed parties by first-class mailing:

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

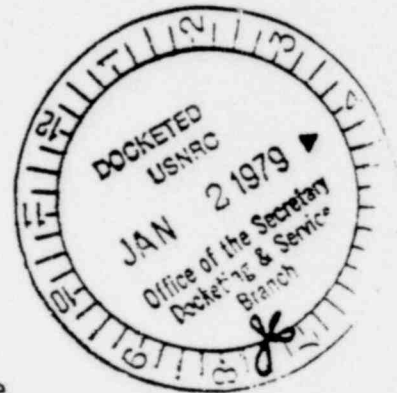
Dr. Walter H. Jordan
881 West Outer Drive
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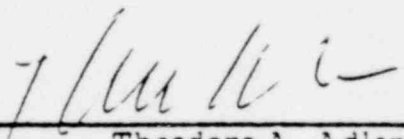
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Theodore A. Adler

Dated: December 26, 1979

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