

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



IN THE MATTER OF: :  
: :  
GENERAL PUBLIC UTILITIES :  
METROPOLITAN EDISON CORPORATION : Docket No. 50-28 :  
: :  
(THREE MILE ISLAND NUCLEAR :  
POWER STATION: :

PETITION FOR LEAVE TO INTERVENE

The Newberry Township T.M.I. Steering Committee (Committee), on its own behalf and on behalf of its members and the following individuals on their own behalf, hereby petition the Nuclear Regulatory Commission (NRC) for leave to intervene in the above-captioned matter pursuant to Section 2.714 of the NRC's Rules of Practice.

IDENTIFICATION OF PETITIONERS

A. Newberry Township T.M.I. Steering Committee. This Petitioner is an unincorporated association whose members have specifically directed its Chairman to execute the attached affidavit on their behalf, which members are all residents of Newberry Township, York County, Pennsylvania, all of which Township is virtually lying within a five (5) mile radius of the Three Mile Island Nuclear Power Station. The Committee's principal concern of relevance here is the potential health problems associated with the reactivation of Unit Number One located at the Three Mile Island Nuclear Station. The Committee's concern is concentrated, for purposes of this Petition, to the issues of the psychological and emotional impact upon the citizens of Newberry Township if reactivation of Unit Number One is authorized by the NRC in light of the recent accident of March 28, 1979.

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b. Mickey Minnich; Richard J. Zlogar; Linda S. Carlisle; Virginia Phillips; C. Willis Wolfe; Linda I. Dominsocki; Patricia A. Smith; Donna K. Umholtz; Colleen M. Clark; M. David Clark; and Michael L. Glock, M.D.

These Petitioners are residents of Newberry Township who all live within five (5) miles of the Three Mile Island Nuclear Power Station. The Petitioner's principal concern of relevance here is the potential health and economic problems associated with the reactivation of Unit Number One located at the Three Mile Island Nuclear Station. The Petitioners' concern is concentrated, for purposes of this Petition, to the attendant psychological trauma experienced by themselves during and after the March 28, 1979, accident and the psychological impact upon surrounding citizens in other communities resulting in bias and prejudice against siting new residential construction, new businesses, and buying improved real estate in Newberry Township as manifested by the decrease in new residential construction, non-existent real estate market and losses experienced by businesses in the Township.

#### INTERESTS TO BE AFFECTED

All Petitioners are concerned that the reactivation of Unit Number One located at the Three Mile Island Nuclear Station will create a serious risk to the psychological well being of its members themselves and the general public which can seriously affect the health and economic welfare of the area surrounding the Three Mile Island Nuclear Power Station. Thus the reactivation of Unit Number One located at the Three Mile Island Nuclear Power Station subjects the Petitioners to potential psychological and attendant economic risk.

### CONTENTIONS

That the psychological impact upon members of the Committee and upon the individual Petitioners of the reactivation of Unit Number One located at Three Mile Island Nuclear Power Station in light of the March 28, 1979, accident which took place at the Three Mile Island Nuclear Power Station is an aspect which has never been adequately considered in any previous hearing. Moreover, the public bias and prejudice generated against the Newberry Township area as a result of the March 28, 1979 accident and the threat of the reactivation of Unit Number One has and will in the future affect the siting of new residential building, new businesses and the purchasing of existing improved parcels of real estate within the Township. As a result of the March 28, 1979 accident at the Three Mile Island Nuclear Power Station the real estate market within Newberry Township has become virtually non-existent and in the event Unit Number One is allowed to be reactivated, the market will be even further depressed. Petitioners contend that this phenomena is directly related to the psychological fear of the public to being closely located to the Three Mile Island Nuclear Power Station. Thus, this fear has and will be manifested in the future by a continuing depressed and/or non-existent real estate market. Petitioners contend that this too is an aspect which has never been adequately considered in any previous hearing.

### CONCLUSION

For these reasons, we urge that the reactivation of Unit Number One located at Three Mile Island Nuclear Power Station not be approved.

Respectfully,

BY: 

Jordan D. Cunningham, Esq.  
FOX, FARR & CUNNINGHAM  
2320 North Second Street

112 211

AFFIDAVIT

NOW COMES Mickey Minnich, and being sworn on oath, deposes and says:

1. That he is the Chairman of the Newberry Township Three Mile Island Stearing Committee;

2. That his address is R.D. <sup>#1</sup>~~42~~, Etters, Newberry Township, York County, Pennsylvania;

3. That he is aware of the contents of the Petition to Intervene and attests that the information contained therein is true and correct to the best of his personal knowledge and belief.

Mickey Minnich  
Mickey Minnich

SWORN TO AND SUBSCRIBED

BEFORE ME, this 24th  
day of August, 1979.

Linda S. Hamilton

NOTARY PUBLIC

LINDA S. HAMILTON, Notary Public  
My Commission Expires Feb. 15, 1982  
Harrisburg, PA Dauphin County

AFFIDAVIT

NOW COMES \_\_\_\_\_ and being duly sworn on  
oath, deposes and says:

1. That (he) (she) is a citizen and resident of Newberry  
Township, York County, Pennsylvania;
2. That (he) (she) lives within approximately five (5) miles  
of the Three Mile Island Nuclear Power Station;
3. That (he) (she) is aware of the contents of the Petition  
to Intervene and attests that the information contained therein is true and  
correct to the best of (his) (her) personal information and belief.

SWORN TO AND SUBSCRIBED

BEFORE ME, this 24th  
day of August, 1979.

Linda S. Hamilton  
Notary Public

LINDA S. HAMILTON, Notary Public  
My Commission Expires Feb. 15, 1982  
Harrisburg, PA      Dauphin County

11-2-213

AFFIDAVIT

NOW COMES Linda Carlisle and being duly sworn on oath, deposes and says:

1. That (he) (she) is a citizen and resident of Newberry Township, York County, Pennsylvania;
2. That (he) (she) lives within approximately five (5) miles of the Three Mile Island Nuclear Power Station;
3. That (he) (she) is aware of the contents of the Petition to Intervene and attests that the information contained therein is true and correct to the best of (his) (her) personal information and belief.

Linda S. Carlisle

SWORN TO AND SUBSCRIBED

BEFORE ME, this 24th  
day of August, 1979.

Linda S. Hamilton  
Notary Public

LINDA S. HAMILTON, Notary Public  
My Commission Expires Feb. 15, 1982  
Harrisburg, PA Dauphin County

112 214



AFFIDAVIT

NOW COMES Colleen M. Clark and being duly sworn on oath, deposes and says:

1. That (he) (she) is a citizen and resident of Newberry Township, York County, Pennsylvania;
2. That (he) (she) lives within approximately five (5) miles of the Three Mile Island Nuclear Power Station;
3. That (he) (she) is aware of the contents of the Petition to Intervene and attests that the information contained therein is true and correct to the best of (his) (her) personal information and belief.

Colleen M. Clark

SWORN TO AND SUBSCRIBED

BEFORE ME, this 24th  
day of August, 1979.

Linda S. Hamilton  
Notary Public

LINDA S. HAMILTON, Notary Public  
My Commission Expires Feb. 15, 1982  
Harrisburg, PA Dauphin County

11-2-215

AFFIDAVIT

NOW COMES Linda S. Hamilton and being duly sworn on oath, deposes and says:

1. That (he) (she) is a citizen and resident of Newberry Township, York County, Pennsylvania;
2. That (he) (she) lives within approximately five (5) miles of the Three Mile Island Nuclear Power Station;
3. That (he) (she) is aware of the contents of the Petition to Intervene and attests that the information contained therein is true and correct to the best of (his) (her) personal information and belief.

SWORN TO AND SUBSCRIBED

BEFORE ME, this 24th  
day of August, 1979.

Linda S. Hamilton  
Notary Public

LINDA S. HAMILTON, Notary Public  
My Commission Expires Feb. 15, 1982  
Harrisburg, PA      Dauphin County

11 2 216



AFFIDAVIT

NOW COMES \_\_\_\_\_ and being duly sworn on oath, deposes and says:

1. That ~~(he)~~ (she) is a citizen and resident of Newberry Township, York County, Pennsylvania;
  2. That ~~(he)~~ (she) lives within approximately five (5) miles of the Three Mile Island Nuclear Power Station;
  3. That ~~(he)~~ (she) is aware of the contents of the Petition to Intervene and attests that the information contained therein is true and correct to the best of (his) (her) personal information and belief.
- \_\_\_\_\_

SWORN TO AND SUBSCRIBED

BEFORE ME, this 24th  
day of August, 1979.

Linda S. Hamilton  
Notary Public

LINDA S. HAMILTON, Notary Public  
My Commission Expires Feb. 15, 1982  
Harrisburg, PA Dauphin County

112 217

AFFIDAVIT

NOW COMES Linda I. Dominoski and being duly sworn on oath, deposes and says:

1. That (he) (she) is a citizen and resident of Newberry Township, York County, Pennsylvania;
2. That (he) (she) lives within approximately five (5) miles of the Three Mile Island Nuclear Power Station;
3. That (he) (she) is aware of the contents of the Petition to Intervene and attests that the information contained therein is true and correct to the best of (his) (her) personal information and belief.

Linda I. Dominoski

SWORN TO AND SUBSCRIBED

BEFORE ME, this 24th  
day of August, 1979.

Linda S. Hamilton  
Notary Public

LINDA S. HAMILTON, Notary Public  
My Commission Expires Feb. 13, 1982  
Harrisburg, PA      Dauphin County

11-2-218

AFFIDAVIT

NOW COMES C. William Wolfe and being duly sworn on oath, deposes and says:

1. That (he) (she) is a citizen and resident of Newberry Township, York County, Pennsylvania;
2. That (he) (she) lives within approximately five (5) miles of the Three Mile Island Nuclear Power Station;
3. That (he) (she) is aware of the contents of the Petition to Intervene and attests that the information contained therein is true and correct to the best of (his) (her) personal information and belief.

C. William Wolfe

SWORN TO AND SUBSCRIBED

BEFORE ME, this 24th  
day of August, 1979.

Linda S. Hamilton  
Notary Public

LINDA S. HAMILTON, Notary Public  
My Commission Expires Feb. 15, 1982  
Harrisburg, PA Dauphin County

AFFIDAVIT

NOW COMES \_\_\_\_\_ and being duly sworn on  
oath, deposes and says:

1. That (he) (she) is a citizen and resident of Newberry  
Township, York County, Pennsylvania;
  2. That (he) (she) lives within approximately five (5) miles  
of the Three Mile Island Nuclear Power Station;
  3. That (he) (she) is aware of the contents of the Petition  
to Intervene and attests that the information contained therein is true and  
correct to the best of (his) (her) personal information and belief.
- \_\_\_\_\_

SWORN TO AND SUBSCRIBED

BEFORE ME, this 24th  
day of August, 1979.

Linda S. Hamilton  
Notary Public

LINDA S. HAMILTON, Notary Public  
My Commission Expires Feb. 15, 1992  
Harrisburg, PA Dauphin County

AFFIDAVIT

NOW COMES

Mr. David Clark

and being duly sworn on

oath, deposes and says:

1. That (he) (she) is a citizen and resident of Newberry Township, York County, Pennsylvania;

2. That (he) (she) lives within approximately five (5) miles of the Three Mile Island Nuclear Power Station;

3. That (he) (she) is aware of the contents of the Petition to Intervene and attests that the information contained therein is true and correct to the best of (his) (her) personal information and belief.

Mr. David Clark

SWORN TO AND SUBSCRIBED

BEFORE ME, this 24th  
day of August, 1979.

Linda S. Hamilton  
Notary Public

LINDA S. HAMILTON, Notary Public  
My Commission Expires Feb. 15, 1982  
Harrisburg, PA Dauphin County

11 2 221

AFFIDAVIT

NOW COMES \_\_\_\_\_ and being duly sworn on oath, deposes and says:

1. That (he) (she) is a citizen and resident of Newberry Township, York County, Pennsylvania;
2. That (he) (she) lives within approximately five (5) miles of the Three Mile Island Nuclear Power Station;
3. That (he) (she) is aware of the contents of the Petition to Intervene and attests that the information contained therein is true and correct to the best of (his) (her) personal information and belief.

SWORN TO AND SUBSCRIBED

BEFORE ME, this 24th  
day of August, 1979.

Linda S. Hamilton  
Notary Public

LINDA S. HAMILTON, Notary Public  
My Commission Expires Feb. 15, 1982  
Harrisburg, PA Dauphin County

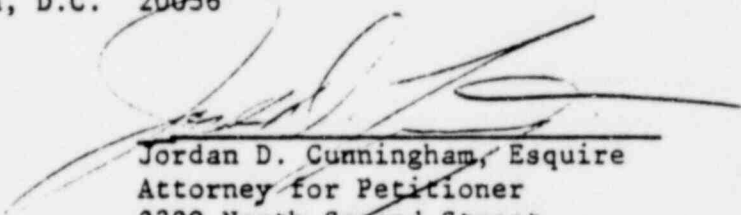
11 2 222

CERTIFICATE OF SERVICE

AND NOW, this 31st day of August, I Jordan D. Cunningham, Esquire, Attorney for Petitioner, hereby certify that I served the within Petition or Leave to Intervene, by depositing same in the United States Mail, postage prepaid, at the post office in Harrisburg, PA, addressed to:

Secretary of the Commission  
United States Nuclear Regulatory Commission  
Washington, D.C. 20055

Geroge Trowbridge, Esquire  
Shaw, Pittnan, Potts and Trowbridge  
1800 M Street, N.W.  
Washington, D.C. 20036

  
Jordan D. Cunningham, Esquire  
Attorney for Petitioner  
2320 North Second Street  
Harrisburg, Pennsylvania 17110  
(717) 238-6570

