

Lic 7/10/81

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))	

LICENSEE'S REPLY TO PROPOSED FINDINGS BY THE
COMMONWEALTH OF PENNSYLVANIA ON SEPARATION
OF TMI-1 AND TMI-2

SHAW, PITTMAN, POTTS & TROWBRIDGE

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I. INTRODUCTION

1. No intervenor filed any proposed findings of fact or conclusions of law relating to separation or groundwater monitoring issues. In accordance with previous Board rulings (see Memorandum and Order on Prehearing Conference of May 13, 1980, dated May 22, 1980, at 12; Memorandum and Order on Schedule and Format for Proposed Findings, dated April 22, 1981, at 2), we find this failure to be a default. 10 C.F.R. § 2.754(b). Proposed findings in this area were filed by Licensee, the Commonwealth of Pennsylvania and the NRC Staff. However, the Commonwealth's proposed findings were limited to two very specific concerns: (a) offsite disposal of low-level radioactive waste, and (b) separation of the fuel handling buildings. As to all other issues relating to separation and groundwater monitoring, the Commonwealth chose not to file proposed findings. We view the Commonwealth's failure to file proposed findings on these issues no different than a failure to file by a party participating pursuant to 10 C.F.R. § 2.714. The Board has fully con-

sidered the specific concerns raised by the Commonwealth, and our resolution of these matters is described below.

II. REPLY TO COMMONWEALTH FINDINGS

A. Offsite Disposal of Low-Level Radioactive Waste

2. The Commonwealth urges this Board to find that, while "Licensee's plans for interim waste storage are adequate to meet the intent of short-term item 5," there has been "an incomplete analysis of the long-range solid waste disposal problem at TMI-1 and 2," solution of which requires the imposition of additional long-term actions. PA PF 32-34.^{1/} The "incomplete analysis" referred to by the Commonwealth relates solely to the adequacy and existence of offsite waste disposal facilities for low-level radioactive wastes. The Board does not believe that such matters are within the scope of this proceeding. Licensee PF 50, at n.14.

3. Whatever limitations may exist with respect to disposal of Unit 1 wastes, they are no different than the situation currently facing all other operating reactors. There are no unique physical problems in transporting or storing wastes that are now onsite at Unit 1 or would be generated during normal Unit 1 operations. Tr. at 10196 (Bellamy).

1/

Proposed findings of fact are cited as PA, Staff or Licensee PF [paragraph number] referring, respectively, to "Commonwealth of Pennsylvania's Proposed Findings of Fact and Conclusions of Law on Plant Design and Modification Issues (First Set)", dated June 4, 1981; "NRC Staff Proposed Findings of Fact and Conclusions of Law Regarding Board Questions 8 and 9", dated June 1, 1981; and "Licensee's Proposed Findings of Fact and Conclusions of Law on Separation of TMI-1 and TMI-2", dated June 1, 1981.

4. The Commonwealth reaches a contrary conclusion by arguing that the "problem is more critical for TMI-1 than for other operating reactors due to the large volume of radioactive waste already present at TMI as a result of the TMI-2 accident." PA PF 34, at subparagraph 3. No reason is offered by the Commonwealth to support this conclusion, and the Board finds it inconsistent with the facts of record. No offsite waste burial facility has limited access to Unit 1 due to the Unit 2 accident. Tr. at 10149 (Fuhrer).^{2/} The wastes to be generated by Unit 1 during operation are no greater than for a similar PWR. See Staff Ex. 1, at C5-6. Due to the separation of Unit 1 and 2 waste handling facilities (see Licensee PF 28-30, 40-52; Staff PF 4, 7, 10, 16, 21), both the quantity and quality of Unit 1 wastes are totally unaffected by Unit 2 cleanup operations. Similarly, Licensee's ability to temporarily store Unit 1 wastes onsite is independent of Unit 2 cleanup operations.^{3/}

^{2/}

The Commonwealth apparently acknowledges that Unit 1 waste disposal is not now restricted due to the Unit 2 accident. But, nonetheless, the Commonwealth seeks a license condition that would require development of a long-range contingency plan, including evaluation of limitations that "may result" from the need to dispose of Unit 2 wastes "if" burial sites impose limits on the overall quantity of waste accepted from the TMI site. There is no record support for any of these contingencies, and the Board finds no reason for requiring such hypothetical analyses. See also ¶ 13, infra.

^{3/}

The Commonwealth appears to harbor some concerns because the interim waste staging facility houses under a single roof modules for Unit 1 and Unit 2 wastes. See Commonwealth PF 34, at subparagraph 1. However, Licensee's witnesses were very clear in emphasizing that the Unit 1 portion of the facility is dedicated exclusively for Unit 1 wastes and that there will be no intermixing of Unit 1 and 2 wastes within the facility. Tr. at 10032-36 (McGoey).

5. The Board, therefore, finds that a wide-ranging evaluation of low-level waste storage contingencies, like that proposed by the Commonwealth, is beyond the scope of this proceeding. The consistent ruling of the Board has been that issues within the scope of this proceeding must have a reasonable nexus to the TMI-2 accident. See NRC Staff's and Licensee's Joint Proposed Introductory Findings 19(a). Where the damaged state of the Unit 2 reactor or the existence of accident-related waste might affect Unit 1 operations, the nexus to the TMI-2 accident is apparent and the Board has had no hesitancy about fully inquiring into such areas. The same cannot be said for the offsite low-level waste disposal issue.

6. Despite our conclusion that consideration of the offsite low-level waste disposal matter is beyond the scope of this proceeding, the Board provides its views on the issue in case the Commission disagrees with the Board's jurisdictional conclusions. At no time did the Commonwealth put any of the parties or the board on notice that it would seek additional onsite storage commitments from the Licensee due to a perceived lack of offsite burial facilities.^{4/} Nor could such relief fairly be read into

^{4/} Throughout the proceeding the Commonwealth filed various position papers setting forth its views as to the issues being litigated. In its first such position paper (see "Commonwealth of Pennsylvania's Report on Positions Formulated Based on Information Available as of July 25, 1980", dated July 31, 1980), the Commonwealth stated (at p. 6):

Although waste storage separation issues appear to have been addressed adequately by NRC requirements imposed thus far, the Licensee must demonstrate that absolute compliance can and will be reached.

The Commonwealth filed a supplementary position paper on January 21, 1981, after the hearing session on plant separation issues. While the supplementary position paper addressed the plant separation issue, it identified no concerns with respect to offsite waste disposal.

the Commission's short-term action item 5. As a result, neither Licensee nor the NRC Staff directly addressed this issue in their prefiled testimony and the oral examination is very limited in scope. Given the parties' lack of notice that the Commonwealth would raise this matter, the Board does not fault either Licensee or the NRC Staff for not further developing the record on this subject.

7. The linchpin of the Commonwealth's position is that current offsite low-level waste disposal facilities may be inadequate for wastes that will be generated during Unit 1 operations. This conclusion is based on testimony that, due to an initiative passed during the last election, the waste burial facility in Richland, Washington would be available for TMI-1 use only until mid-1981, Tr. at 10025 (Fuhrer), and that, if the waste burial facility at Barnwell, South Carolina is the only facility available to TMI-1, the allocation program in place there may cast into doubt Licensee's ability to dispose of all TMI-1 wastes. Tr. at 10026 (Fuhrer). This testimony has been overtaken by superseding events. On June 26, 1981, the United States District Court for the Eastern District of Washington found the Washington initiative "unconstitutional and thus unenforceable." Washington State Building & Construction Trades Council v. Spellman, No. C-81-154 RJM.^{5/} As a result, TMI-1 is no longer facing the prospect that it will be unable to ship low-level radioactive waste to the Richland burial

^{5/}

A copy of this decision was served on all parties by Licensee at the time Licensee served its Reply Findings on July 10, 1981.

facility after mid-1981. Thus, the potential problem perceived by the Commonwealth no longer exists.

8. This decision clearly confirms the Board's reluctance to adjudicate the low-level waste disposal issue in this proceeding. We already have commented that the record is not as complete as we would desire for a full airing of the issues. See ¶ 6, supra. The Board is aware that there is a substantial amount of relevant background information that is not in the record. This court decision illustrates the rapidly changing nature of the issue. Taken together these factors convince the Board that it would be premature to order the relief sought by the Commonwealth.

9. Moreover, the Board finds that many of the underlying findings proposed by the Commonwealth in support of its position on offsite waste disposal facilities are unsupported by the record and give a misleading view of the evaluations conducted by the NRC Staff. For example, the Commonwealth would have the Board find that the NRC Staff "has conducted no independent analysis of Licensee's options should offsite burial become unavailable." PA PF 22. In fact, Dr. Bellamy's testimony was that the NRC is aware of Licensee's contingency plans and is reviewing them. Tr. at 10197. Dr. Bellamy further testified that the NRC Staff was in the process of reviewing Licensee's proposed on-site storage facilities and that the criteria being imposed by the NRC Staff for such a facility at TMI are no different than at any other reactor site. Id. Subsequent to Dr. Bellamy's testimony this review was completed and reported in Supplement 3

to the SER. See Staff Ex. 14, at 20.^{6/}

10. The Commonwealth also urges this Board to find that it is "not clear" when the engineering aspects of Licensee's waste storage contingency plan will be completed. PA PF 28. As explained by Licensee's witness, the contingency plan consists of

6/

The Commonwealth criticizes the NRC Staff's review as "apparently based on the projected production of solid waste from a typical PWR for a period of two years" and because it is alleged that the specific waste volumes from Units 1 and 2 have not been considered. PA PF 30. The Board already has found that the waste generated by Unit 1 operations will be similar to other PWRs. See ¶ 4, supra. The Board also finds the Commonwealth's characterization of the testimony to be misleading. The Commonwealth did not request a witness on the adequacy of Licensee's waste staging facility. As counsel therefore noted, "if [the witness] can answer my questions, fine. And if not, I guess I'm out of luck." Tr. at 21403 (Adler). In response to questioning, Mr. Stoddart testified that he was not aware of the specifics of the analysis done by the NRC Staff since he did not do it. Tr. at 21403 (Stoddart). He made an assumption, which he stated "may or may not be correct", that the waste generated by a typical PWR was analyzed. Id. He further testified that he "presume[d]" this was the manner in which the analysis was done, but he could not "of course testify that this is the way that it was done." Tr. at 21404 (Stoddart). As to whether the specific waste volumes from Units 1 and 2 were considered, Mr. Stoddart just did not give a responsive answer. Id. With respect to Unit 1 wastes, the Board does know that site specific design waste quantities were provided to the NRC Staff both as a table in Licensee's Restart Report (see Lic. Ex. 1, at Table 7.3.1, section III), and in response to a specific question (id., at Supplement 1, Part 2, Question 53(E)). And, with respect to Unit 2 wastes, the Board finds it inconceivable that the NRC Staff is unaware of the quantity of waste that may require shipment offsite. Licensee's testimony includes an extended discussion of the strict regulatory oversight being conducted by the NRC Staff at Unit 2. See generally Fuhrer and McGoe, ff. Tr. 10020, at 31-38. Dr. Bellamy, a member of the onsite NRC Staff, testified that the NRC was "deeply into discussions with other government agencies, such as the Department of Energy, for long-term storage of the TMI-2 wastes." Tr. at 10197. Licensee also testified that NRC review will be obtained prior to selecting additional onsite storage methods for Unit 2 wastes. Fuhrer and McGoe, ff. Tr. 10020, at 20.

two parts. The first, construction of the interim waste staging facility is to be completed in October 1981. Licensee PF 50; Tr. at 10028 (McGoey). The second phase of the contingency plan, an engineering recommendation for future action, was to be presented to management around April 1981. Tr. at 10028 (McGoey). As we already have noted, see ¶¶ 7-8, supra, circumstances relating to waste storage are continually changing, and the Board perceives no need to set a date certain when this analysis is to be completed. In fact, we would expect this phase of the contingency plan to be updated as assumptions are modified by changing events.

11. In summary, the Board finds that Licensee has made adequate plans for the temporary onsite storage of low-level wastes and that the NRC Staff has adequately reviewed those plans and reported the results in its SER and Supplement 3 thereto. The Board believes that the concerns raised by the Commonwealth in this area are somewhat unrealistic. The wastes at issue are low activity waste, consisting of materials like evaporator bottoms, dry trash and other low specific activity ("LSA") waste. See Lic. Ex. 1, at Supplement 1, Part 2, Question 53(D), Page 2. There is little difficulty in handling such waste, and the large areas available at TMI to temporarily store such waste, either within present structures or at the south end of the island, lead us to conclude that no waste storage actions beyond those already identified (see Licensee PF 50 & n.14) are required to protect the public health and safety.

12. The Commonwealth has suggested that we require three additional long-term actions. PA PF 34(1)-(3). The first of these would direct the NRC Staff to conduct a site-specific review of the TMI interim waste staging facility and determine a minimum and maximum time that TMI-1 can be operated in the absence of available offsite disposal facilities. We already have found the review conducted in this area by the NRC Staff to be adequate. See n.6, supra. No purpose would be served by requiring that the review be extended to report the amount of time TMI-1 can be operated in the absence of offsite burial facilities. The Board has no way of gauging the likelihood of the contingency specified in the Commonwealth's request -- i.e., the absence of offsite burial facilities. Nor does the Board see how such an analysis would necessarily protect the public health and safety. We therefore decline to impose a requirement on the NRC Staff that such an evaluation be conducted.

13. The second long-term action requested by the Commonwealth is development by Licensee of a long-range contingency plan for disposing of low-level waste generated at TMI. As previously noted (see ¶ 10, supra), Licensee already is developing such a contingency plan. While we do not know whether this plan considers limitations that burial facilities may place on the overall quantity of waste accepted from the TMI site, the Board does not believe that such a contingency need be considered. The record provides no basis for assuming that any such limitation might ever be imposed, and any analysis along these lines would

be extremely sensitive to assumptions with respect to the extent of the overall limit and the date when it is imposed. The Board sees no benefit to public health and safety emerging from such a hypothetical analysis.

14. The last long-term action sought by the Commonwealth is limiting conditions on operation of TMI-1 based on the additional analyses it would like the NRC Staff and Licensee to perform. Because we have rejected the need for such analyses, the Board also finds no need for any limiting conditions on operation based on these analyses.

B. Separation of the Fuel Handling Buildings

15. The Commonwealth urges this Board to find that "there is an inadequate basis to determine that the requirements of short-term item 4 have been met with respect to separation and/or isolation of the TMI-1 and TMI-2 fuel handling areas and the TMI-1 auxiliary building." PA PF 62. The Board rejects this proposed finding. We believe the record adequately supports a finding that Licensee's actions to separate the fuel handling buildings comply with the Commission's short-term action item 4 and are sufficient to protect the public health and safety. Licensee PF 31-33; Staff PF 17-19.

16. The Commonwealth's position appears to turn on a substantial misunderstanding with respect to phase 2 of Licensee's separation program. Based on this misunderstanding the Commonwealth harbors concerns in three areas: (a) SDS operation, (b) Unit 2 fuel handling operations, and (c) testing requirements.

Below we initially review Licensee's two-part program to separate the fuel handling buildings and then discuss each of the three issues raised by the Commonwealth.

17. The first part of Licensee's separation program is to isolate the Unit 1 auxiliary building from the Unit 1 fuel handling building. This will be accomplished by constructing a tunnel-like barrier that would provide personnel passage between the Unit 1 control tower and the Unit 1 auxiliary building, but would also form part of a barrier that will seal the open areas between the Unit 1 auxiliary building and the Unit 1 fuel handling building. Tr. at 10054 (Fuhrer). The purpose of this modification is to isolate the Unit 1 auxiliary building from the Unit 1 and Unit 2 fuel handling buildings. This modification will be completed prior to restart. Licensee PF 33.

18. The second part of Licensee's separation program is to install an ESF filter system in the Unit 1 fuel handling building. This modification will be completed after restart but before the first refueling. Licensee PF 33. The purpose of this modification is not to protect against any accidents in the Unit 2 fuel handling building, but rather to protect against Unit 1 fuel handling accidents. It is for this reason that the NRC Staff concluded in its SER that "[s]ince there will be no fuel movement in the TMI-1 fuel handling area until that time [i.e., the next Unit 1 refueling outage], we find [the timing of this modification] acceptable." Staff Ex. 1, at C4-8.

19. It appears to the Board that much of the Commonwealth's

proposed findings with respect to separation of the fuel handling buildings are based on the premise that the ESF filter system at Unit 1 is being installed to protect against Unit 2 cleanup operations. This simply is not so. Protection of Unit 1 areas against a possible Unit 2 cleanup accident is being accomplished through installation of the environmental barrier between the Unit 1 auxiliary building and the Unit 1 fuel handling building. See ¶ 17, supra.

20. The NRC Staff reviewed the adequacy of this separation in its initial SER and found it acceptable. Staff Ex. 1, at C4-8. Since the detailed design of the ESF filter system was not available at the time the SER was issued, the NRC Staff indicated that it would report on the adequacy of that filter system in a supplement. Id. at C4-9. The NRC Staff has in fact reviewed the ESF filter system in SER Supplement 3 and found it adequate. Staff Ex. 14, at 19.^{7/}

21. With this background information, we now resolve the three concerns raised by the Commonwealth. The first relates to potential impacts from SDS operation on Unit 1. PA PF 43-48. Accident analyses of SDS operation have been performed and the

^{7/} Commonwealth PF 39, 40 and 41 purport to comment on the adequacy of the NRC Staff's review of Licensee's separation program. The Board rejects these proposed findings because they assume that the only review of Licensee's separation program was that connected with the detailed design of the ESF filter system. As we have indicated, the primary NRC Staff review of the separation program was conducted substantially earlier and reported in the initial SER. The testimony elicited from Mr. Stoddart and cited in Commonwealth PF 39, 40 and 41 relates solely to the ESF filter system review.

consequences of those accidents have been calculated; the maximum offsite dose is projected to be about 2×10^{-4} mrem. Fuhrer and McGoey, ff. Tr. 10020, at 42-43. This information has been submitted to the NRC Staff for its review. Tr. at 10069 (McGoey). The Board notes that on June 18, 1981, the NRC Staff issued an immediately effective order requiring Licensee to "promptly commence and complete processing of the highly contaminated Reactor Building and reactor coolant system water and the intermediate level water in the Auxiliary Building tanks with the SDS and, if necessary, the EPICOR II system." 46 Fed. Reg. 32716 (June 24, 1981). This order was supported by a Safety Evaluation Report (NUREG-0796) setting forth the NRC Staff's safety review and conclusions. Id.

22. One of the postulated SDS accidents analyzed by Licensee was the impact of dropping a shipping cask containing an SDS resin liner. Tr. at 10059 (McGoey). Since the resin is a solid-type material, Licensee expects a minimal airborne problem. There is a very slight potential for particulate contamination to enter the air, but this is believed to be a very low probability event with this type of waste. Any such contamination would be a localized problem. Tr. at 10059-60 (McGoey). The environmental barrier would be adequate to preclude spread of this contamination to the Unit 1 auxiliary building. See ¶¶ 17 & 19-20, supra. While the airborne activity might spread to the operating floor

of the Unit 1 fuel handling building, Licensee's witness did not believe that such an event would prevent Licensee from continuing refueling operations at Unit 1. Tr. at 10060 (McGoey).^{8/} The Board therefore finds that SDS accidents and the potential impacts of such accidents on Unit 1 operations have been analyzed adequately.

23. The second area of concern raised by the Commonwealth relates to the handling of Unit 2 fuel and potential impacts from such activities on Unit 1 operations. PA PF 49-55. In an earlier part of this Recommended Decision, the Board has addressed fully the impacts from Unit 2 fuel handling on Unit 1 operations. Licensee PF 24-26. Nothing the Commonwealth states leads us to modify the views previously expressed. The Commonwealth does refer to testimony by Mr. Stoddart that, in his personal view, a license condition should preclude any fuel handling until completion of phase 2 of Licensee's separation program. PA PF 55. The Board was somewhat surprised by Mr. Stoddart's testimony on this point. It is contrary to the NRC Staff view expressed in the SER which found the timing of phase 2 acceptable "[s]ince there will be

^{8/}

The Commonwealth cites testimony by Mr. Stoddart that either an SDS or fuel drop accident at TMI-2 would require sealing off the Unit 1 fuel handling building. PA PF 47. Actually, Mr. Stoddart testified that, if such an accident occurred where there was airborne contamination which did spread to the Unit 1 fuel handling building, the area probably would be sealed off. Tr. at 10161-62 (Stoddart). Even if this occurred, there would be no adverse effects to Unit 1 operations. Mr. Stoddart testified that access to the Unit 1 fuel handling building is not required during either normal or emergency conditions. Stoddart, ff. Tr. 10159, at 23; see also Licensee PF 26 & n.10.

no fuel movement in the TMI-1 fuel handling area until that time" (Staff Ex. 1, at C4-8). It also appears to be contrary to Mr. Stoddart's prefiled direct testimony which concluded that "an accident at TMI-2 during cleanup and decontamination will not affect TMI-1 operations through the common fuel handling building." Stoddart, ff. Tr. 10159, at 23. Moreover, the NRC Staff did not rely on this testimony by Mr. Stoddart in its proposed findings. Since Mr. Stoddart offered no basis to support his personal view, and since it is contrary to the conclusions of the NRC Staff (both in its SER and proposed findings), the Board is not willing to accept the suggested license condition. See also ¶ 18, supra.

24. The Commonwealth also suggests a need for full core offloading at TMI-1 during certain unusual events, PA PF 53, and a study by Licensee to identify potential accidents which may require such offloading. PA PF 62(3). While the testimony shows that a full core offloading may be necessary to accommodate access to the reactor vessel to overcome a problem that has been identified in the reactor vessel, Tr. at 10067 (McGoey), the testimony does not establish that full core offloading is required to protect the public health and safety. Licensee's witnesses were unaware of any Technical Specification requirement for full core offloading, Tr. at 10067-68 (McGoey & Fuhrer), and the Board itself is aware that, as a general matter, full core offloading is not required for any safety function. It is, as Licensee's witness testified, a "desirable" capability. Tr. at 10068 (Fuhrer). The Board concludes, however, that this "desirable capability" is not

so significant as to require the study sought by the Commonwealth. Indeed, we are not sure that there are any accidents that would require a full core offloading to protect the public health and safety.

25. The last area of concern identified by the Commonwealth relates to testing requirements for the separation program. PA PF 56-61. The Board agrees with the Commonwealth that the record fails to disclose whether, and to what extent, Licensee will test the adequacy of its ventilation separation program. Therefore, we will require as a condition for restart that Licensee submit to the NRC Staff a program designed to test the adequacy of its phase 1 ventilation separation program. The NRC Staff is to include in its certification to the Commission that a satisfactory test program has in fact been implemented.

26. In summary, the Board finds that Licensee's program to separate the Unit 1 and Unit 2 fuel handling buildings complies with the Commission's short-term action item 4 and is adequate to provide reasonable assurance that the public health and safety will be protected. The Commonwealth requests that we require three additional short- and long-term actions. PA PF 62(1)-(3). We already have set forth our resolution of the substantive issues underlying the Commonwealth's requests, which we summarize below.

27. The Commonwealth first seeks NRC Staff review of phase 1 of Licensee's separation program. This already has been done. See ¶¶ 20-21 & .7, supra. In addition, the Commonwealth requests development of a testing program with respect

to phase 1. We agree and will require Licensee to submit a phase 1 test program to the NRC Staff. See ¶ 25, supra.

28. The second action requested by the Commonwealth is a license condition precluding TMI-1 operation during Unit 2 defueling operations prior to completion of phase 2 of Licensee's separation program. This request is based on the Commonwealth's misconception that phase 2 is designed to provide the necessary protection against Unit 2 defueling accidents. This is not so. See ¶¶ 17-19, supra. Since the test program for phase 2 suggested by the Commonwealth is in terms of protecting Unit 1 from Unit 2 cleanup accidents, we reject that request, too. The Commonwealth also requests that a comprehensive study of potential Unit 2 fuel handling accidents be conducted. The analysis to date of Unit 2 fuel handling accidents is sufficient to support restart of Unit 1. See ¶ 23, supra. Any further analysis necessary to assure the public health and safety during the actual Unit 2 defueling is better handled in the context of the NRC Staff's ongoing regulation of Unit 2 activities. We also believe that the adequacy of any further analysis is beyond the scope of this Board's jurisdiction.

29. The last request of the Commonwealth is for a study of potential Unit 1 accidents that may require offload of the Unit 1 core. We find no need for such a study (see ¶ 24,

supra), and therefore reject this request.

Respectfully submitted,

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Dated: July 10, 1981