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Dec. 8, 1983

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Nunzio Palladino, Chairman  
Victor Gilinsky, Commissioner  
Frederick M Bernthal, Commissioner  
James Asselstine, Commissioner  
U.S. Nuclear Regulatory Commission  
1717 H. Street, N.W.  
Washington, DC 20555

RE: TMI-1 Restart/ Scheduled Meeting for Dec. 19  
and Previous Meeting of Dec. 5

Gentlemen:

The recent NRC meeting of Dec. 5, was a marvel of intriguing contradictions which raised more questions than it answered:

Arguments based on a shell game of management juggling to lend respectability and credence to GPU to evade the responsibility and the consequences of their criminal negligence associated with NRC violations, is inappropriate, erodes the credibility of the NRC, demeans the intent of the regulatory system and leaves justice an orphan.

Surely the Commission would not be so irresponsible as to send a clear message to GPU and ALL nuclear operating utilities that to violate NRC regulations and consort in willful and deliberate acts which create dangerous consequences to the health and safety of Americans is now a permissible endeavor without swift and appropriate punishment. A fine of \$85,000 can hardly be described as fair and adequate punishment when the ratepayers will be expected to pay the fine.

The introduction of bank loans and auto accidents into the discussions of the Dec. 5 meeting merely lowered top priorities to the level of the mundane and obscured the real issues into dancing shadows.

After listening to the this juvenile dialogue, it has occurred to me that reiteration of the priority issues is in order:

1. Falsification of leak rate data prior to the March 79 accident.
2. GPU personnel participating in test cheating...some, of which, still remain with the company.
3. Management's attempt to force Bechtel employees to "sign-off" on work-sheets related to the polarcrane operation
4. Procrastination of GPU to address all the improvements and repairs which the NRC requested be made.
5. Lack of cooperation in adequately separating Unit 1 from Unit 2 which recently introduced activity into Unit 2.

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6. Krypton 85 gas release event described in Region 1 Inspection Report 50-289 83-26. (Nov. 4 - 83) Eisenhut) from Unit 1.
7. Starostecki report (Nov. 2, 1983): (NRC Director Div. of Project Programs.)

"At this time we can only state that nonadherence to procedures did occur at TMI 1 in the area of radiological controls, valve positioning and emergency and administrative procedures implementation".

- (a) "In particular, we are concerned about the three apparent procedure violations regarding transfer of a "Hittman" liner containing solidified radioactive waste from the spent resin tank June, 1983...a breakdown in the proper implementation of radiological control program".
- (b) "Concern for two procedure violations regarding improper valve positions for nonautomatic containment isolation valves".
- (c) "There appears to be a lack of timely review to resolve a discrepancy that caused a containment isolation valve to be partially open...two independent verifications of valve position failed to identify a valve in a "stuck" open position."
- (d) "Three apparent violations during hot functional testing (steam generator tubes) in which valves were inadvertently left open or were misoperated, that resulted in safety components being inoperable for short periods of time. As a result, in one instance, a small amount of a radioactive tracer gas (Krypton 85) was inadvertently released from Three Mile Island Unit 1 on August 29, 1983." "Two other instances resulted in (1) hydrogen concentration exceeding Technical Specification limits in the waste-gas system; and, (2) an inoperable condenser offgas system plant effluent monitor".

These are just a few of the recent violations quoted directly from the NRC's own documents. All this and more has occurred at TMI.

Yet NRC Staff Harold Denton testified and advised the Commission that GPU "Now has an organization that has the potential to do much better than it has in the past" "But twenty-four hour surveillance will be required to keep people (GPU personnel) on their toes". If this isn't a contradiction in opinion, then I don't know the meaning of the word.

We are reassured by the NRC Staff that Philip R. Clark, (Robert Arnold's replacement) will somehow create a miracle at TMI and all the mind-set of the past five years will be wiped away just by saying it is so. Our experience with Mr. Clark's veracity has proven to be in greater jeopardy than Mr. Arnold's. The changing of the guard is an act of cosmetics and nothing more. We need to remember that Mr. Clark has been with GPU for the past four years.

The scheduled meeting for Dec. 19, indicating a closed-door session is just another precedent-setting decision which deprives Americans of any control over their own lives. This type of tactic must be brought to a grinding halt by Congress.

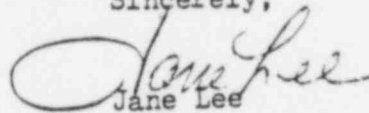
The circus-like atmosphere which surrounds the operation of GPU increases with every passing year until we have now reached the point where the elephants and donkeys are in the left ring, the clowns, surrounded by dancing girls, are in the right ring and the monkeys are on center stage.

It is not enough that GPU and the NRC have stolen from our purse by increasing electric rates to pay for GPU's errors and prolonging decisions on licensing a utility who has violated every regulation in the book and threatened out health and safety, but because it is now almost five years they have even stolen our lives by refusing to deal with the embarrassment of GPU. We have been robbed of our time with our children, time spent with friends, even the pleasant everyday leisures we once took for granted because for the past five years we have been compelled to research and present facts which the NRC's Staff seen fit to withhold and conceal from the Commissioners. Those facts have been converted into hard evidence, much to the chagrin of the Staff, so further apologies on behalf of GPU by the NRC is just so much wind in the sea.

Respect is not something to be given on demand but rather is offered willingly out of admiration for ethical and heroic deeds rendered by men of honor. Such, I am sorry to say, has not been the case with the NRC or GPU.

It is past time to return this GPU dilemma to some form of professional dignity and credibility by addressing the issues headon in a fair and equitable manner; setting aside political considerations and political pressure emanating from the White House. The decision, based on the facts, can only be a permanent revocation of GPU's license to operate Unit 1. So let it be done now!

Sincerely,



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