

LEAGUE OF WOMEN VOTERS OF PENNSYLVANIA

STRAWBRIDGE & CLOTHIER • 8th & Market Streets • Philadelphia, Pennsylvania 19105 • (215) 627-7937

June 7, 1984

Dr. Nunzio J. Pallidino, Chairman
Nuclear Regulatory Commission
1717 H St., N.W.
Washington, D.C. 20555

Dear Dr. Pallidino:

The League of Women Voters of Pennsylvania has serious misgivings about a restart at Unit 1 at this time. Questions have been raised concerning the competence of the officials of GPU Nuclear to run TMI, and the technical safety of the plant. These basic health and safety issues cannot be left for resolution until after the reactor is restarted.

Yet to be resolved is the issue of whether management has been involved by participation, encouragement or condoning, in certain instances of cheating on control room operator exams. Allegations have been made that company management hindered the NRC investigation into this episode. This possible cheating also opens up the issue of whether the training program for operators is adequate, and whether the operators themselves are competent.

Procedural violations cited in NRC inspection reports may indicate inadequate management attention: failure to follow procedures, failure to adequately prepare workers entering high-radiation areas, failure to notify the NRC of accidental releases of krypton gas in August 1983.

We are concerned that leak-test data which Met-Ed admitted were falsified at Unit 2, and which may have led to the accident at Unit 2, may also have been falsified at Unit 1. Until the data are verified, it would be unconscionable to schedule restart.

Repairs were made to Unit 1's steam generators in 1981 using a technique which had not been included in the plant's original operating license. The operating license will need to be amended, with hearings as promised by the NRC. Serious questions also remain about the safety of these repairs. Should they fail, radiation leakage may occur.

One contributing factor in the accident at Unit 2 was the inability of operators to measure water level accurately.

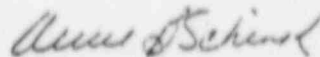
Industry-wide safety standards and equipment that were mandated by the 1979 accident have not been instituted and installed at Unit 1. Assurance is needed that the necessary changes will be made at Unit 1 prior to restart to prevent such an accident there.

According to the Federal Emergency Management Agency, five major deficiencies and more than one hundred minor ones were found during an emergency drill staged in the area surrounding Three Mile Island in November 1983. Adequate emergency preparedness is vital to the restart issue.

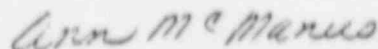
The NRC must conclude its investigation of the open questions affecting TMI. By scheduling the decision on restart prior to the completion of its investigation, the NRC will be deciding the question without the information which the commission solicited, information that is required before the commission can determine that TMI can be operated safely. TMI is not just a nuclear reactor, it is the site of the worst accident in the history of commercial nuclear power. Public confidence in nuclear power was built on two decades of safe operation from the firing of the first reactor until March, 1979 when the accident occurred in Middletown, PA. That accident and the ensuing events have shaken the faith of the American people in the safety of nuclear power. By approving restart at this time, with so many questions still unanswered, the NRC will be ignoring its own documented concerns, and those of the many thousands of people living in the shadow of TMI.

We urge you to postpone your decision until such time as the safety of the reactor and the integrity of its management can be assured.

Sincerely yours,



Anne B. Schink
President



Ann McManus
Energy Director

cc: Commission members