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822-1084

February 25, 1985

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In the Matter of
Metropolitan Edison Company
(Three Mile Island Nuclear Station Unit No. 1)
Docket No. 50-289 SP

Gentlemen:

During the remanded hear. on the Dieckamp mailgram
issue, Licensee referred to a statement in NUREG-0600

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PDR ADOCK 05000289
G PDR

DBS

Messrs. Smith, Wolfe and Linenberger

February 25, 1985

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concerning offsite and onsite radiation measurements. Tr. 30,420-22. Licensee intended to rely on this statement to demonstrate, if necessary, that any 3mR/hr reading of which Walter Creitz learned prior to 11:00 a.m. on March 28, 1979, must have been an onsite reading.^{1/} The pertinent part of NUREG-0600 stated:

Radiation levels measured by land-based onsite and offsite teams first began to increase at 1020 on March 28, with an onsite team in the North Parking lot reporting a radiation level of 3mR/hr.

* * *

Offsite radiation levels reported during this period, with the exception of 50 mR/hr measured at 1548 on PA Route-441 about 1500 feet south of northgate . . . , were not above background until 2238 when a radiation level of 13 mR/hr was measured near Kunkel School (5.6 mi. n.w.).

NUREG-0600, JME 1(c)(62) at II-3-81.^{2/}

In preparing Reply Findings, Licensee noted a discrepancy between this statement and Table II-C-1 in NUREG-0600, which records several above background offsite readings after 11:00 a.m. but long before 1548 or 2238 on March 28th. Licensee then reviewed the accident radiation survey log for the 28th and

^{1/} In its proposed findings, TMIA has attempted to establish that before addressing the PaPUC on the day of the accident, Mr. Dieckamp was informed by Mr. Creitz of a 3mR/hr offsite radiation level that allegedly had been measured before 11:00 a.m. Thus, Licensee found it necessary to address this issue in its Reply Findings. See Licensee's Reply Findings, dated February 25, 1985, ¶¶ 30-35.

^{2/} The Report of the Special Inquiry Group similarly stated, "Measured offsite radiation levels generally remained below background levels except for a reading of 50mR/h at 7:48 p.m. on the road east of Unit 2 near the Observation Center." Report of the Special Inquiry Group, Vol. II, Part 3, at 868.

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determined it confirms the NUREG-0600 Table that in fact levels above background were detected offsite shortly after 11:00 a.m. The radiation survey log^{3/} is attached for the Board's information.

It still remains Licensee's position that any 3mR/hr radiation level of which Mr. Creitz learned prior to 11:00 a.m. on the 28th was an onsite level. However, Licensee does not wish to cite a statement in NUREG-0600 that appears to be inaccurate in other respects, or for the Board to be misled. Accordingly, Licensee in its Reply Findings (LIC Reply 32) cites Table II-C-1 of NUREG-0600. This table is in evidence, although it was not noticed for citation by Licensee during the hearing.

In addition, Licensee takes the opportunity to alert the Board and parties to several additional references to the Joint Mailgram Exhibit which were not noticed for citation during the hearing. Licensee found it necessary to cite these references to reply to TMIA's "time gap" theory (TMIA PF 200-202) -- an argument which TMIA raised in its findings. These citations are JME 1(c)(67) at 17, JME 1(c)(62) at I-A-89 and I-A-103, and JME 1(c)(10) at 21. The citations appear at LIC REPLY 39.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

Ernest L. Blake, Jr.

Ernest L. Blake, Jr., P.C.
Counsel for Licensee

Attachment
cc: Service List

3/ This log was produced during discovery, and the second page of the log was admitted into evidence as part of TMIA Mailgram Exh. 32B. The radiation readings of interest here, however, appear on the first page. Because the first page of the log is not in evidence, Licensee has not relied on it in its Reply (even though it may be the best evidence on this point).

Time		Reading (mR/hr)	Grid & Location
1153		L1	S. end of Island
1155		L1	Obs. Ctr.
1152	I	LMDA $\mu\text{Ci/cc}$	SE-01 along Rt. 441
1152	I	LMDA $\mu\text{Ci/cc}$	E-01 Behind Obs. Ctr. along Rd.
1141		L1	E-01
1133	I	$7.9 \text{ E-8 } \mu\text{Ci/cc}$	on-site boundary east of Unit 2 cooling tower
1000	I	$1.6 \text{ E-7 } \mu\text{Ci/cc}$	N. Parking Lot
1128	I	$2.84 \text{ E-7 } \mu\text{Ci/cc}$	SE-01 site boundary - ca
1129	PART.	$9.0 \text{ E-8 } \mu\text{Ci/cc}$	warehouse SE-05
1123		L1	SE-01 - along Rt. 441
1116		L1	South Bridge
1114		L1	N-01 C.P. Tracks along Rt. 441 near Airport
1112		L1	SE-01 Red Hill
1111		3	Tomberry Garden Ctr.
1109		L1	wood 500 KV Sub. & Obs. Ctr.
1107		2.5	Between cooling tower on Rt. 441
1107		2	NW-01 Hughes Church Rd. & Rt. 441
1104		2	on-site boundary east of Unit 2 cooling tower
1048	I	LMDA	NE-01 Hughes Church
1104		2	on-site boundary east of Unit 2 cooling tower
1057		7	SE-04
1058		L1	Obs. Ctr.
1048		L1	NE-01 Hughes Church
1048		3	N. Weather Station
1048		L1	Obs. Ctr.
1020		2-3	N. Parking Lot
1020		L1	Turnpike Bridge
1029		L1	North Gate
1021		3	North Park Lot
1012		L1	North Park Lot

<u>Time</u>	<u>Readings</u>	<u>Grid & Location</u>
0805	I < MDA uCi/cc	GE-9 on site
0810	I 1.24 E-8 uCi/cc	South of
0840	I 5.26 E-9 uCi/cc	on site near
0842	L 1	warehouse #2
0842	L 1	W. Goldsboro Marina
1232	10	WSW-11 south of
1233	7-8	Goldsboro
1234	L 1	Sts care house
1234	I 5.98 E-9 uCi/cc	GE-10 on site - near
1250	I 3.54 E-8 uCi/cc	warehouse #1
1315	L 1	near
1318	L 1	GE-2 northgate
1316	L 1	GE-2 northgate
1322	4	obs. Ctr.
1327	2-3	ANAW-31 in air over
1327	3-4	transportation
1327	2-3	over hill
1326	4	NW Island
1322	4	in air over Obmatt's
1322	10	airport Runway & Taxi
1330	10	N. Park. Lot
1330	20	Unit 1 air intake
1348	I 1.71 E-9 uCi/cc	Unit 1 air intake
1355	3	Sts in front of warehouse
1358	1	N. Park. Lot
1405	8-10	N. Park. Lot
1400	3	Sts to N. weather Stn
1426	I 6.81 E-7 uCi/cc	400 ft. above
1426		Unit 1 cooling tower
		300 ft. above
		Unit 2 Rx Bldg.
		GE-4 on site - between
		cooling towers
		GE-2 on site near
		northgate
		N-11 - middle town
		Unit 1 air intake
		around Unit 2 Rx Bldg.
		west of security fence
		on site - near
		GE-2 northgate
		Foxes in middle town
		at square in middle town

3/28

③

Middletown Swim Club

1445

<1

1453

30 mr/hr

GE-2

1458

I 1.43 E-9 uCi/cc

Middletown Swim Club

1403

I 3.5 E-9 uCi/cc

1427

I 1.22 E-8 uCi/cc

N Middletown Square

1541

70

GE-2

1556

8

GE-2

1547

20

approaching north gate

1547

12

GE-2 North gate

1548

50

on Rt. 441 opposite GE-2

1545

<1

Tri-County Boat Club

1541

70

GE-2

1544

3

1/4 mi south of old smoking on 441

1545

150

front of service bldg. - outside

1600

<1

- north gate -

1605

<1

- north gate -

1611

80

Front of service bldg.

1615

50

GE-2 North gate

1601

I 2.02 E-7 uCi/cc

GE-2

1640

45

Inside service bldg. on Unit 1

1601

I 2.27 E-9 uCi/cc

NNE-01

1645

55

outside service bldg. - Unit 1

1650

<1 mr/hr

N21 Middletown

1720

<1 mr/hr

N11 Royalton

1720

140

GE-10

1720

210

Relat. GE1 and GE-10

1730

40

GE1

1735

<1

N11 -

GEM JOURNAL

<u>Time</u>	<u>Reading</u>	<u>Grid & Location</u>
1730	35 mR/mR	Front of Service BLDG
1653	9.57 ϵ^{-9}	Outside N-21
1719	2.269 ϵ^{-9}	N-11
1815	< 1 mR/mR	N. GATE to Ob. Center
1826	NON-detectable (mR/mR)	R+ 441 / M. town & S. Union St
1825	< 1 mR/mR	N. GATE
1825	NON-detectable (mR/mR)	441 & RR Tracks
1830	13 mR/mR	Service BLDG
1830	26 mR/mR	GE-2 N. GATE at Yield Sign
1830	0.5 mR/mR	N. GATE
1835	< .05 mR/mR	N. GATE
1830	< .05	Tri County Boat Club
1835	< 1	Along 230
1915	< 1	Across Bridge from N. Gate
1915	< .05	Tri County Boat Club
1916	< 1	GE-1
1917	12	Between GE-1 & GE-10
1917	10	GE-10
1920	20.	Behind Warehouse
1920	3	GE-9
1923	< 1	South from UI Arch Draft Cooling tower
1940	9	RMA 5
1943	20-2 25 closed 42 open	Behind Warehouse
2115	5.2 $\times 10^{-7}$ μ Ci ϵ^{-13} I/c	(behind) W of W

MICROFILMED

$$I = \frac{\text{Counts}}{(\text{Eff} \times \text{Vol.}) (2.22 \text{ EG})}$$

$$(.0341) (4.25 \text{ EG})$$

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 Remand
(Three Mile Island Nuclear)	on Management)
Station, Unit No. 1))	

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