

STATEMENT TO THE NUCLEAR REGULATORY COMMISSION
May 22, 1985

By
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Mr. Chairman and Commissioners:

My statement addresses physical readiness of the TMI-1 plant, readiness of the staff, emergency preparedness, and the extent of the publicly available record.

In summary, I believe that there is ample basis in the public record for you to conclude that the questions and concerns which caused the immediately effective Shutdown Orders of July and August, 1979, have been resolved; and that GPU Nuclear has demonstrated the ability to operate TMI-1 safely and, at the same time, to clean up TMI-2 safely.

The TMI-1 plant is ready to startup. We have made appropriate modifications to respond to the lessons learned from the TMI-2 accident and from other nuclear plant operating experience. The steam generators have been repaired and returned to licensing basis condition. With the exception of a few items which can only be done during actual restart, the plant, including the steam generators and the modifications, has been tested and shown to be satisfactory.

Startup of any plant after a substantial shutdown period always identifies some problems. TMI-1 will be no exception. However, we have defined a

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Careful program for Restart including an extensive test program. We also will operate for several weeks at two intermediate power levels to provide added assurance of equipment performance and operator familiarity before we proceed to full power.

The organization and its people are ready to operate the plant safely. The GPU Nuclear organizational structure and the key operating management at TMI-1 have been in place since GPUN became the licensee in January, 1982. They have demonstrated the ability to modify and maintain the plant and, to the maximum extent possible under the Shutdown Order, to operate the systems and equipment. The staff has extensive operating experience. We have a full, six shifts of trained and licensed operators and full-time, on shift qualified shift technical advisors. We also have special, degreed Q-A monitors on shift. In addition, our programs in such vital areas as Training, Quality Assurance and Radiological Controls have been expanded and enhanced to where they are among the best in the industry.

In response to the recent ASLB decision on Training, we are developing a formal method of providing periodic feedback to the training program from evaluation of actual job performance.

There have been four, full-scale Emergency drills at TMI-1. Company performance was rated satisfactory in each one. Earlier this year, NRC & FEMA formally concluded that Emergency Preparedness at TMI and in the surrounding counties has been demonstrated to be adequate to protect public health and safety.

A great deal of attention has been focused recently on the adequacy of the public record. We are convinced it is fully adequate to support a favorable decision on Restart. It is unprecedented and has involved:

- o Six years of proceedings, evaluations and investigations
- o Over 3,000 pleadings
- o Over 2,000 statements
- o Some 200 witnesses testifying and subjected to cross examination
- o Over 30,000 pages of transcripts plus additional tens of thousands of pages of testimony and supporting information
- o Over 2,500 pages of formal opinions.

All pertinent issues have been addressed and shown to pose no significant safety questions related to TMI-1 operation. In addition, on the great majority of the issues your review process has been completed through the Appeal process and decisions issued. This is beyond the point at which Commission licensing decisions are normally made.

Finally, overall evaluations of TMI-1 by both INPO and the NRC Systematic Assessment of Licensee Performance program are publicly available.

There have been and likely will continue to be attempts to re-raise old issues or introduce new allegations here at the last minute. We have confidence that these will be recognized for what they are. It is clear that some of the parties involved will never be satisfied to see TMI-1 operate and will continue to seek any basis for delay.

The issues which formed the basis for immediate effectiveness of the Shutdown Orders have been investigated, discussed, litigated at length, and resolved. The plant and its staff meet or exceed all the established criteria for granting permission to operate. There is before you ample basis to make a favorable decision on Restart of TMI-1. In view of the severe adverse effects of continued shutdown, we believe that both law and fairness require that lifting of the Shutdown Orders be made immediately effective.