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January 29, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
INQUIRY INTO THREE MILE) Docket No. LRP
ISLAND UNIT 2 LEAK RATE)
DATA FALSIFICATION)

PETITION TO INTERVENE
OF GARY P. MILLER

Gary P. Miller hereby petitions to intervene in this proceeding.

1. During the period February 2, 1978 through March 28, 1979, Mr. Miller served at various times as Unit Superintendent of Three Mile Island Unit II, Station Superintendent of the Three Mile Island Nuclear Station (the Station), and Station Manager of the Station.

2. Mr. Miller's future professional status may ultimately be affected by this proceeding.

3. Pursuant to the Commission's Order and Notice of Hearing, dated December 18, 1985, the Presiding Board is to address, among others, these issues:

- (a) How were the Technical Specification 3.4.6.2 requirements for reactor coolant system

DS02

unidentified leakage interpreted and
implemented by . . . on-site . . . management?
Following the discovery by an NRC inspector in
October 1978 that Technical Specification
3.4.6.2 requirements were not properly
interpreted or implemented, what corrective
action was taken by management personnel?

Mr. Miller can present testimony that will
contribute to the development of an adequate record
on these issues.

In short, Mr. Miller has an interest that may
be affected by this proceeding, and it is likely
that he will contribute to development of an
adequate record. He should be made a party to this
proceeding.

Respectfully submitted,

GARY P. MILLER

By Michael W. Maupin
Michael W. Maupin,
Counsel

Of Counsel

Michael W. Maupin
Maria C. Hensley

HUNTON & WILLIAMS
P.O. Box 1535
Richmond, Virginia 23212

Dated: January 29, 1986



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CERTIFICATE OF SERVICE

I certify that copies of Petition to Intervene of Gary P. Miller, dated January 29, 1986, were served upon the following persons by deposit in the U.S. Mail, first class, postage prepaid, today:

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Chief, Docketing and
Service Section

Presiding Board
TMI Leak Rate Data Proceeding
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

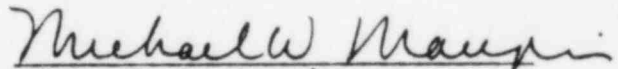
Jack R. Goldberg, Esquire
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Harry H. Voigt, Esquire
LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Smith B. Gephart, Esquire
Killian & Gephart
218 Pine Street
Harrisburg, Pennsylvania 17108

James B. Burns, Esquire
Isham, Lincoln & Beale
3 First National Plaza
Chicago, Illinois 60602

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555


Michael W. Maupin
Counsel for Gary P. Miller

Dated: January 29, 1986



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NOTICE OF APPEARANCE

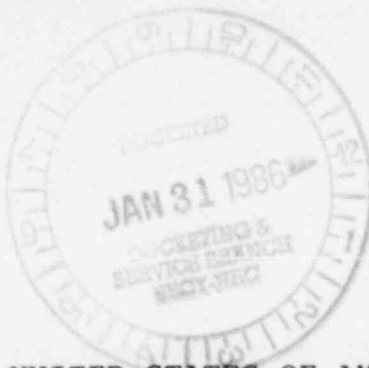
The undersigned, an attorney-at-law in good standing admitted to practice before the Supreme Court of Virginia, enters his appearance in this proceeding as counsel on behalf of Gary P. Miller, RD 2, Box 425, Fairview Road, Columbia, Pennsylvania 17512.

Respectfully submitted,

Michael W. Maupin
Michael W. Maupin

HUNTON & WILLIAMS
P.O. Box 1535
Richmond, Virginia 23212

(804) 788-8372



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The undersigned, an attorney-at-law in good standing admitted to practice before the Supreme Court of Virginia, enters her appearance in this proceeding as counsel on behalf of Gary P. Miller, RD 2, Box 425, Fairview Road, Columbia, Pennsylvania 17512.

Respectfully submitted,

Maria C. Hensley
Maria C. Hensley,

HUNTON & WILLIAMS
P.O. Box 1535
Richmond, Virginia 23212

(804) 788-8336



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I certify that copies of Notices of Appearance of Michael W. Maupin and Maria C. Hensley, dated January 29, 1986, were served upon the following persons by deposit in the U.S. Mail, first class, postage prepaid, today:

Secretary
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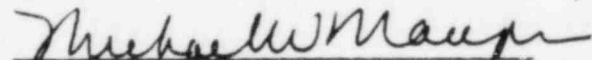
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Michael W. Maupin
Counsel for Gary P. Miller

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