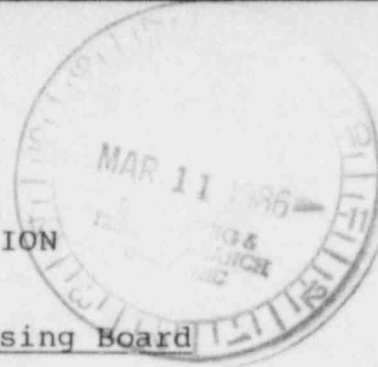


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



Before the Atomic Safety and Licensing Board

In the Matter of)
METROPOLITAN EDISON COMPANY)
(Three Mile Island Nuclear)
Station, Unit 1))

Docket No. 50-289 *OLA*
(Steam Generator
Plugging Criteria)

TMIA'S SUPPLEMENT TO PETITION FOR LEAVE TO INTERVENE

Pursuant to the Licensing Board's February 12, 1986, Notice of Hearing on Issuance of Amendment to Facility Operating License, TMIA hereby submits a list of contentions to have litigated in the above-captioned proceeding:

CONTENTION 1. Neither the Licensee nor the NRC Staff have demonstrated that allowing degraded tubes to remain in service under the proposed revised plugging criteria will provide reasonable assurance that TMI-1 can operate without endangering the public health and safety, because the form and rate of new tube degradation has not been determined.

CONTENTION 2. Neither the Licensee nor the NRC Staff have demonstrated that allowing degraded tubes to remain in service under the proposed revised plugging criteria will provide reasonable assurance that TMI-1 can operate without endangering the public health and safety, because the testing technique relied upon to define degraded tubes is inaccurate and inconclusive, in light of the particular method of degradation.

CONTENTION 3. Neither the Licensee nor the NRC Staff have demonstrated that allowing degraded tubes to remain in service

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under the proposed revised plugging criteria, which could contribute to the frequency of leakage during plant operations, is consistent with the requirements of GDC 32.


CONTENTION 4. Neither the Licensee nor the NRC Staff have demonstrated that allowing degraded tubes to remain in service under the proposed revised plugging criteria, is consistent with the requirements of GDC 31, in that the criteria does not take into account environmental effects, including possible environmental corrosion even in the absence of active corrosion mechanisms.

CONTENTION 5. Neither the Licensee nor the NRC Staff have demonstrated that allowing degraded tubes to remain in service under the proposed revised plugging criteria is consistent with Reg. Guide 1.121, which requires that plugging criteria contain an operational degradation allowance to take into account variations in tube thickness due to possible corrosion.

Respectfully submitted,

THREE MILE ISLAND ALERT, INC.

By:


Joanne Doroshov