

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 No. 1))

Docket No. 50-289

LICENSEE'S ANSWER TO UNDATED PETITION FOR
LEAVE TO INTERVENE BY NEWBERRY TOWNSHIP
T.M.I. STEERING COMMITTEE ET AL.

Metropolitan Edison Company (Licensee) hereby submits its answer to an undated Petition for Leave to Intervene filed jointly by Newberry Township T.M.I. Steering Committee and eleven named residents of Newberry Township (Petitioners). The certificate of service attached to the petition indicates that the petition was mailed to undersigned counsel on August 31, 1979, and a copy of the petition was received by undersigned counsel on September 4, 1979. In accordance with the Board's Memorandum and Order, dated August 31, 1979, Licensee's answer is confined to the adequacy of the petition from the standpoint of Petitioners' showing of interest and identification of the aspect or aspects of the proceeding as to which intervention is sought.

Licensee agrees that the petition adequately sets forth Petitioners' interest in the proceeding and the specific aspect or aspects of the subject matter of the proceeding in which Petitioners wish to intervene. With respect to the Newberry Township

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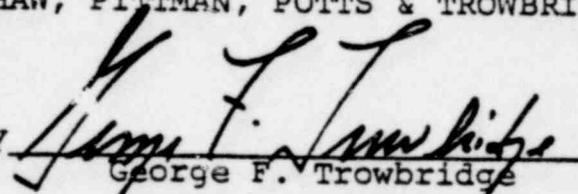
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T.M.I. Steering Committee, an unincorporated association, one of the affidavits attached to the petition identifies Mr. Mickey Minnich as the Chairman of the Steering Committee and as a resident of Newberry Township. Thus the petition on its face identifies by name at least one individual member of the Steering Committee with an interest in the proceeding who has implicitly authorized the Steering Committee to represent that interest in the proceeding.

Since the only aspects of the proceeding set forth in the petition relate to the psychological impacts associated with the reactivation of Three Mile Island Nuclear Station, Unit No. 1 and resulting impacts on the health and economic welfare of citizens and businesses in Newberry Township, the Board's ultimate determination of the allowability of the petition must await the filing of contentions by Petitioners and resolution by the Commission, in accordance with the procedures specified in its Order and Notice of Hearing, dated August 9, 1979, as to whether the issues sought to be raised by Petitioners are legally relevant to this proceeding.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By 
George F. Trowbridge

Date: September 7, 1979

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September 7, 1979

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Answer to Undated Petition for Leave to Intervene by Newberry Township T.M.I. Steering Committee Et Al.," dated September 7, 1979, were served upon the following persons by deposit in the United States mail, postage prepaid, this 7th day of September, 1979.

Ivan W. Smith, Esquire
Chairman
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

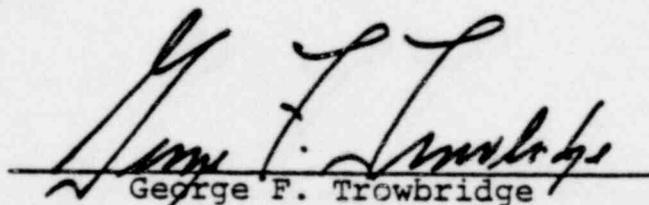
Jordan D. Cunningham, Esquire
Attorney for Newberry Township
T.M.I. Steering Committee
2320 North Second Street
Harrisburg, Pennsylvania 17110

Dr. Walter H. Jordan
Atomic Safety and Licensing
Board Panel
881 West Outer Drive
Oak Ridge, Tennessee 37830

James A. Tourtellotte, Esquire (4)
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Linda W. Little
Atomic Safety and Licensing
Board Panel
5000 Hermitage Drive
Raleigh, North Carolina 27612

Docketing and Service Section (21)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555


George F. Trowbridge

Dated: September 7, 1979

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