

TIC

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



INTERROGATORIES OF INTERVENOR
THREE MILE ISLAND ALERT, INC.
TO COMMONWEALTH OF PENNSYLVANIA

Three Mile Island Alert, Inc., by its attorneys, Widoff, Reager, Selkowitz and Adler, P.C., hereby files the following interrogatories pursuant to 10 C.F.R., Section 2.740(b). These interrogatories are deemed to be continuing, and shall be supplemented by the Commonwealth when and if additional or corrective information is obtained.

1. Was any person or persons employed by the Commonwealth notified by Licensee of the March 28 accident?

2. If so,
 - (a) State the name, address and telephone number of each Commonwealth employee in contact with representatives of the Licensee for 72 hours following the accident.

POOR ORIGINAL

1645 203

7912270 III

G

(b) State the name, address and telephone number of the Licensee representatives with whom the Commonwealth was in contact;

(c) Provide:

(1) copies of any such written communication;

(ii) if the communications were oral, (1) any contemporaneous memoranda capsulizing the oral communication and

(2) any tape recordings or transcripts of such tape recordings that were made.

1645 204

3. Did the Licensee provide to the Commonwealth radiation dose readings for the period March 28, 1979 to April 5, 1979?

4. If so,

(a) State the name, address and telephone number of the Commonwealth employee(s) to whom these reports were submitted;

(b) Provide copies of all written reports submitted;

(c) Provide copies of transcripts, tapes or contemporaneous memoranda of all oral reports.

1645 205

5. Did the Commonwealth take radiation dose readings for the period March 28, 1979 to April 5, 1979?

6. If so,
 - (a) State what types of monitors were used;

 - (b) State the location of each monitor;

 - (c) Provide copies of readings provided by each monitor.

7. Did the Commonwealth compare its radiation readings with those being supplied by the Licensee or by other governmental or private entities?

8. If so,
 - (a) State the name, address and phone number of each person who reviewed and compared the readings submitted;

 - (b) Provide copies of all reports, memoranda or other correspondence that in any way deals with this review or comparison.

1645 206

9. Do any Commonwealth agencies have an office or facility within five (5) miles of TMI-1? If so, where are the offices or facilities located?

10. Do any of the agencies listed in your response to Interrogatory Number 9 maintain radiation monitors or dosimeters on a regular basis at the locations noted in your answer to Interrogatory Number 9? If so, which ones?

11. Have employees of any of those agencies reported radiation readings for a period including March 28 to April 5, 1979 that was higher than normal?

12. If so,
 - (a) State the name, address and telephone number of the employees;

 - (b) Provide copies of the reports filed;

 - (c) If the reports were oral, provide a copy of any contemporaneous record, tape or transcript made of the report.

1645 207

13. Were any radiation readings mentioned in your answer to Interrogatory Number 11, at variance with readings taken by the Licensee, federal agencies or other state agencies at similar or identical locations?

14. If so, detail which readings were at variance.

15. Did the Commonwealth require the Licensee to report to it on a regular basis as to what was occurring at TMI-2 during the period of the accident?

16. If so,
 - (a) State how often the Commonwealth expected a report;

 - (b) State whether Licensee complied with these requests and if it did not, specifically indicate how they failed to comply.

 - (c) State specifically each instance where information provided to the Commonwealth by the Licensee proved to be:
 - (1) totally in error

1645 208

- (2) at least 50% in error
- (3) less than 50% in error
- (4) totally correct

(d) Provide copies of all memoranda or other related correspondence that commented on the ability or inability of the Commonwealth to obtain accurate information from the Licensee.

- 17. Do the various law enforcement agencies of the Commonwealth, including the State Police, maintain intelligence files on anti-nuclear groups?
- 18. If so, were these files maintained prior to the March 28, 1979 accident?
- 19. If the answer to Interrogatory Number 18 is no, what information has been obtained by the Commonwealth since the accident that indicated that intelligence gathering on these groups is necessary?

- 20. If the answer to Interrogatory 18 is yes, what information does the Commonwealth possess that indicates that such surveillance is necessary?

1645 209

21. Has the Commonwealth received information indicating that civil disruptions could occur at TMI if TMI-1 were reopened?
22. If so,
- (a) Provide the name, address and phone number of the sources providing this information;
 - (b) Detail the substance of the information received;
 - (c) Provide copies of all memoranda and correspondence received or drafted that discusses civil disruption or threaten civil disruption in the event that TMI-1 is reopened.
23. Does the Commonwealth presently have a health and evacuation plan to implement in the event a TMI-2 type accident were to occur at TMI-1?
24. If so, provide copies of all reports describing what steps the Commonwealth intends to take to protect the health and safety of persons living near the

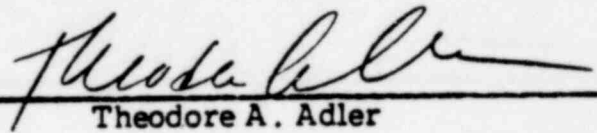
1645 210

plant in the event of such an accident.

25. If an evacuation plan exists, please provide copies of it.

Respectfully submitted,

WIDOFF, REAGER, SELKOWITZ & ADLER, P.C.

By: 
Theodore A. Adler

1645 211

CERTIFICATE OF SERVICE

I do hereby certify that I served a true and correct copy of the foregoing document on the below listed parties by first-class mailing:

Ivan W. Smith, Esquire
Atomic Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Walter H. Jordan
881 West Outer Drive
Oak Ridge, TN 37830

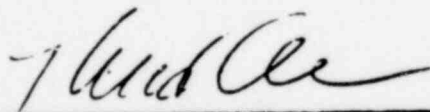
Dr. Linda W. Little
5000 Hermitage Drive
Raleigh, NC 27612

George F. Trowbridge, Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, DC 20006

Docketing and Service Section
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555





Theodore A. Adler

Dated: December 13, 1979

1645 212