#### RELATED CORRESPONDENCE

## UNITED STATES OF AMERICA

# NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

METROPOLITAN EDISON COMPANY, et al.

Docket No. 50-289

(Three Mile Island, Unit 1)

#### COMMONWEALTH OF PENNSYLVANIA'S RESPONSE TO FIRST SET OF NRC STAFF INTERROGATORIES

In its Interrogatories dated December 27, 1979, and received December 31, 1979, the NRC staff appears to request in a footnote that all intervenors, including the Commonwealth, respond to the "general interrogatories" submitted.

General interrogatories No. 1 and No. 2 request identification of witnesses and a description of their testimony for all "admitted issues." The Commonwealth, like the other represented state agencies, has no "admitted issues," but is willing to provide the requested information, with appropriate affidavits, then it becomes available. The Commonwealth does not expect to begin identifying witnesses until all revised emergency planning contentions are final and have been reviewed thoroughly.

General Interrogatories No. 3 and No. 4 refer to subsequent interrogatories directed specifically to other intervenors. No response is required.

Respectfully submitted,

KARIN W. CARTER

Assistant Attorney General Commonwealth of Pennsylvania

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### CERTIFICATE OF SERVICE

I hereby certify that copies of the Commonwealth of Pennsylvania's Response to I'irst Set of NRC Staff Interrogatories, dated January 16.

1980 were served upon those persons on the attached Service List by deposit in the United States mail, postage paid, this 16th day of January, 1980.

KARIN W. CARTER

Assistant Attorney General

Dated: January 16, 1980

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