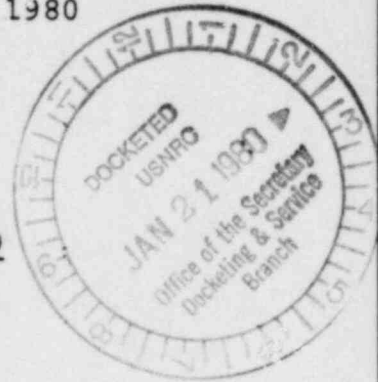


January 18, 1980

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))

LICENSEE'S FIRST SET OF INTERROGATORIES TO
INTERVENOR CHESAPEAKE ENERGY ALLIANCE, INC.

These interrogatories are filed pursuant to 10 C.F.R. § 2.740b, which requires that the interrogatories be answered separately and fully in writing and under oath or affirmation. Licensee recognizes that Intervenor Chesapeake Energy Alliance, Inc. ("CEA") may not now be able to completely answer all interrogatories propounded below. Licensee therefore requests that each of these interrogatories be answered within the time specified in § 2.740b to the extent that responsive information is presently available to CEA. With respect to those interrogatories for which complete and responsive information is not now available to CEA, Licensee requests that revised answers be provided prior to the close of the discovery period established in the Licensing Board's December 18, 1979 First Special Pre-hearing Conference Order.

Any reference to CEA shall be deemed to include all members of CEA. When knowledge or information of CEA is requested, such request includes knowledge or information of

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CEA's members.

The following definitions apply to each of the interrogatories below:

A. "Document" means all writings and records of every type including, but not limited to memoranda, tapes, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, diaries, logs, speeches, articles, transcripts and all other records, written, electrical, mechanical or otherwise.

B. "Identify" means:

(1) With respect to a natural person, name, present or last known home or business address, present or last known job title or position, and the dates of tenure in that position;

(2) With respect to a document, the type of document (e.g., letter, record, list, memorandum, memorandum of telephone or face-to-face conversation, etc.), date of the document, title of the document, subject of the document, name of person who prepared the document, and name of person for whom the document was prepared or to whom it was delivered.

Interrogatories on Contention No. 5

5-1. Describe with particularity the "possible interference from [Unit 2] contaminated water with storage space that might be required in the event of a TMI-1 accident."

(a) Identify the potential Unit 1 accidents assumed in the contention, remembering that the

Licensing Board already has ruled that the scenario postulated in CEA Contention No. 2(a) is to be excluded.

(b) Estimate the quantity of radioactive wastewater requiring storage at Unit 1 which CEA contends will be generated by each of the accident scenarios identified above.

(c) Describe the mechanism by which CEA contends that each of the identified accidents will generate the quantity of radioactive wastewater requiring storage as estimated above.

5-2. Describe the potential accidents during decontamination and clean-up at Unit 2 which CEA contends might impact on the operation of Unit 1.

5-3. Identify each risk to the safe operation of Unit 1 which CEA contends is associated with the Unit 2 accidents described in the response to Interrogatory 5-2. For each risk so identified:

(a) Set forth each and every fact and the source of each and every fact upon which CEA bases its conclusion.

(b) Identify all documents, and the particular parts thereof, containing any evidence or information bearing upon or relating to CEA's conclusion.

(c) Identify all persons having any information or knowledge supporting or relating to CEA's conclusion.

5-4. Identify any evidence based on actual operation of EPICOR-II of which CEA is aware indicating that the effectiveness, reliability and/or safety of EPICOR-II is not as anticipated prior to actual operation.

5-5. Describe the basis for CEA's claim that a delay in the ultimate disposal of processed TMI-2 wastewater may interfere with emergency storage facilities that may be needed in the event of an accident at Unit 1.

Interrogatories on Contention No. 6

6-1. Explain the basis for CEA's claim that "TMI-2 continues to 'leak' contaminated water."

- (a) Define what CEA means by the word "leak".
- (b) Identify the source of each alleged "leak".
- (c) Identify where the contaminated water is allegedly "leaking" to.
- (d) Quantify (if known) in gallons per minute the rate of each "leak".

6-2. Explain with particularity the risk to safe operation of Unit 1 from the "leaks" identified in the response to Interrogatory 6-1.

6-3. Explain the basis for CEA's claim that "as long as TMI-2 continues to generate surplus radioactive water that TMI-2 continues to pose the threat of returning to an active emergency status."

- (a) Define what CEA means by the phrase "returning to an active emergency status."

(b) Explain with particularity the risk to safe operation of Unit 1 posed by such "emergency status."

(c) Is this risk the same as the "potentially severe conflict with operation of TMI-1" referred to in the last sentence of Contention No. 6? Explain what CEA means by "severe conflict with operation of TMI-1."

Interrogatories on Contention No. 7

7-1. Does CEA contend that the physical separation of Units 1 and 2, as described in the TMI-1 Restart Report, pages 7-1 through 7-6, and Supplement 1, Part 2, questions 52 and 54, is inadequate to resolve the concerns identified in CEA Contention No. 7? If so:

(a) Describe in detail the inadequacies of the physical separation proposed by Met-Ed.

(b) For each inadequacy listed, set forth each and every fact and the source of each and every fact relating to or bearing upon the allegation.

(c) For each inadequacy listed, identify all documents, and the particular parts thereof, containing any evidence or information relating to or bearing upon the allegation.

(d) For each inadequacy listed, identify all persons having any information or knowledge supporting or relating to the allegation.

7-2. Does CEA contend that the safety evaluation performed by the NRC Staff with respect to the physical separation of Units 1 and 2, as described in the January 11, 1980 Status Report on the Evaluation of Licensee's Compliance with the NRC Order dated August 9, 1979 ("Status Report"), pages C4-1 through C4-16, with particular reference to the section on "Process and Effluent Radiological Monitoring System (p. C4-10), is inadequate to resolve the concerns identified in CEA Contention No. 7? If so:

(a) Describe in detail the inadequacies of the physical separation safety evaluation performed by the NRC Staff.

(b) For each inadequacy listed, set forth each and every fact and the source of each and every fact relating to or bearing upon the allegation.

(c) For each inadequacy listed, identify all documents, and particular parts thereof, containing any evidence or information relating to or bearing upon the allegation.

(d) For each inadequacy listed, identify all persons having any information or knowledge supporting or relating to the allegation.

Interrogatories on Contention No. 8

8-1. Identify all alleged "evidence of the inadequacy of licensee's management capability", other than the specific items referenced in a through k which are set forth as a "Basis for Contention #14" by Intervenor Steven C. Sholly.

(a) For each piece of evidence listed, set forth each and every fact and the source of each and every fact relating to or bearing upon the allegation [including, for example -- where the piece of evidence is a particular Licensee action -- the date of the alleged action, a description of the alleged action, and the name(s) of the specific person(s) who took the alleged action (if known), etc.].

(b) For each piece of evidence listed, identify all documents, and the particular parts thereof, containing any evidence or information relating to or bearing upon the allegation.

(c) For each piece of evidence listed, identify all persons having any information or knowledge supporting or relating to the allegation.

Interrogatories on Contention No. 12

12-1. Does CEA intend to adopt UCS' Contention No. 13? If so, answer interrogatories 12-2 through 12-5 below.

12-2. Describe the accidents which CEA contends are credible and not bounded by the TMI-1 design basis accidents.

12-3. Explain as to each accident identified in answer to interrogatory 12-2 the nexus between such accident and the TMI-2 accident.

12-4. Explain what CEA means when it contends that an accident is not "bounded" by the design basis accidents for TMI. Indicate in particular as to each accident identified in answer to interrogatory 12-2 whether the term "bounded" refers

to accident events or accident consequences or both.

12-5. Describe the criteria proposed by CEA to be used for selecting credible accidents to be considered.

Interrogatories on Contention No. 13

13-1. Describe the "mindset" to which CEA refers in Contention No. 13, referring to the sections of NUREG-0600 upon which CEA relies, describing in particular detail any "mindset" to which CEA refers which differs from that addressed in NUREG-0600.

13-2. Does CEA contend that the operator training program, as described in the TMI-1 Restart Report, pages 6-1 through 6-17, is inadequate to resolve the concerns identified in CEA Contention No. 13? If so:

(a) Describe in detail the inadequacies of the operator training program proposed by Met-Ed.

(b) For each inadequacy listed, set forth each and every fact and the source of each and every fact relating to or bearing upon the allegation.

(c) For each inadequacy listed, identify all documents containing any evidence or information relating to or bearing upon the allegation.

(d) For each inadequacy listed, identify all persons having any information or knowledge supporting or relating to the allegation.

13-3. Does CEA contend that the safety evaluation performed by the NRC Staff with respect to the operator training program, as described in the January 11, 1980 Status Report on

the Evaluation of Licensee's Compliance With the NRC Order dated August 9, 1979 ("Status Report"), pages C6-4 through C6-5, is inadequate to resolve the concerns identified in CEA Contention No. 13? If so:

(a) Describe in detail the inadequacies of the operator training program evaluation performed by the NRC Staff.

(b) For each inadequacy listed, set forth each and every fact and the source of each and every fact relating to or bearing upon the allegation.

(c) For each inadequacy listed, identify all documents, and the particular parts thereof, containing any evidence or information relating to or bearing upon the allegation.

(d) For each inadequacy listed, identify all persons having any information or knowledge supporting or relating to the allegation.

Interrogatory No. 14

14-1. With respect to each individual whom CEA intends to call as a witness in this proceeding:

(a) Identify by name, address and affiliation each such individual;

(b) State the educational and professional background of each such individual, including occupation and institutional affiliations, publications and papers;

(c) Identify the contention as to which each such individual will testify;

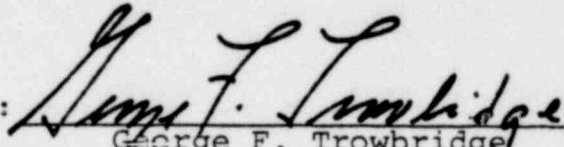
(d) Describe the nature of the testimony which will be presented by each such individual, including an identification of all documents which the individual will rely upon in the testimony;

(e) Identify by court, agency or other body, proceeding, date and subject matter all prior testimony by each such individual.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By:


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Counsel for Licensee

Dated: January 18, 1980

January 18, 1980

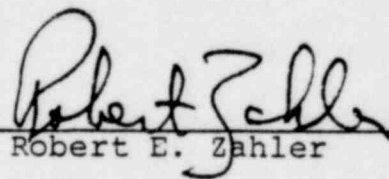
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's First Set of Interrogatories to Intervenor Chesapeake Energy Alliance, Inc." were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 18th day of January, 1980.


Robert E. Zahler

Dated: January 18, 1980

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