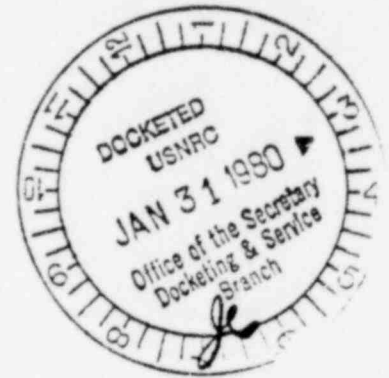


RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of :
: METROPOLITAN EDISON COMPANY : Docket No.
: (Three Mile Island Nuclear : (Restart)
Station, Unit No. 1) :

PENNSYLVANIA PUBLIC UTILITY COMMISSION'S
FIRST SET OF INTERROGATORIES
TO LICENSEE METROPOLITAN EDISON

These interrogatories are filed by the Pennsylvania Public Utility Commission (the "Commission") 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. With respect to those interrogatories for which complete and responsive information is not now available to Metropolitan Edison, the Commission 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 Prehearing Conference Order.

Any reference to the "Licensee" or "Met Ed" shall be deemed to include any sister or parent corporation of Met Ed. When knowledge or information of Met Ed is requested, such request includes knowledge or information of Met Ed's members and, unless privileged, its attorneys (if any).

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DEFINITIONS

- A. "Document" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, to which the responding party has or has had access.
- B. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, to which the responding party has access which considers, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage and whether or not the consideration was discontinued prior to completion.
- C. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or other business enterprise or legal entity.
- D. "You" or "your" means the party to the proceeding to whom these information requests are addressed.
- E. "Identify" or "identity" used in reference to a natural person means to state his or her full name and residence address, present or last known position and business affiliation, and position and business affiliation at the time in question.
- F. "Identify" or "identity" when used in reference to a document means to state the date or dates, author or originator, subject matter, all addresses and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof

or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in your possession or subject to your control, state what disposition was made of it.

- G. "Identify" or "identity" when used in reference to a business entity means to state its full name, the address of its principal office, and the type of entity.
- H. "And" and "or" are both conjunctive and disjunctive.
- I. Words in the singular include the plural, and words in the plural include the singular. "Each" and "any" are both singular and plural.
- J. Words in the past tense include the present, and words in the present tense include the past.
- K. Words in the masculine gender include the feminine gender and words in the feminine gender include the masculine gender.

INSTRUCTIONS

- L. If any matter is evidenced by, referred to, reflected by, represented by, or recorded in any document identify or produce for discovery and inspection each such document.
- M. These information requests are continuing in nature, and information which the responding party later becomes aware of or has access to and which is responsive to any request is to be made available to Bell.
- N. Unless otherwise expressly provided, each information request should be construed independently and not with reference to any other, information request herein for purpose of limitation.

- O. Answer each designated part of each information request separately.
If you do not have complete information with respect to any information request, so state and give as much information as you do have with respect to the matter inquired about and identify each person who you believe may have additional information with respect thereto.
- P. The information requests are to be answered under oath by an authorized person.
- Q. If you object to any information request or to the production of any document on the grounds of an asserted privilege, identify the privileged document or subject matter claimed to be privileged, explain the reasons for your claim of privilege and make a response to any portion of the request to which you do not object and produce any documents called for by the request to which you do not assert a claim of privilege.

1) State the name, address, position and occupation, place of employment and subject matter of testimony of all witnesses who will be called by Met Ed in this proceeding to testify on any aspect of Met Ed's financial position and capabilities, either past, present or future.

2) State the name, address, position and occupation, place of employment and subject matter of testimony of all witnesses who will be called by Met Ed in this proceeding to testify on any aspect of Met Ed's managerial capability or competence, past, present or future.

3) For each person named in response to Nos. 1 and 2 above who will testify to matters of opinion based upon asserted expertise in some recognized discipline, profession or occupation, state all

educational institutions attended after secondary school, all undergraduate and graduate degrees granted, areas of concentration, titles of theses, professional articles and books authored or co-authored; caption, docket number, date, place and subject matter summary of any prior testimony in any state or federal judicial or administrative proceeding, as well as the name of the party for whom appearing.

4) How does Met Ed define "financially qualified" in the context of this proceeding? If financial tests or ratios are referenced, specify methodology employed.

5) What facts or opinions demonstrate that Met Ed is financially qualified to operate TMI-1? If reference is made to documents, attach them or provide verbatim summaries thereof.

6) Have any cash flow studies been prepared by or for Met Ed? If so, state by whom they have been prepared, the dates of preparation and source and nature of assumptions used. Attach copies or verbatim summaries thereof.

7) How does Met Ed define "managerially capable" in the context of this proceeding?

8) What facts or opinions demonstrate that Met Ed is managerially capable to operate TMI-1, while maintaining TMI-II in a safe configuration and supervising cleanup and decontamination tasks? If reference is made to documents, attach them or provide verbatim summaries thereof.

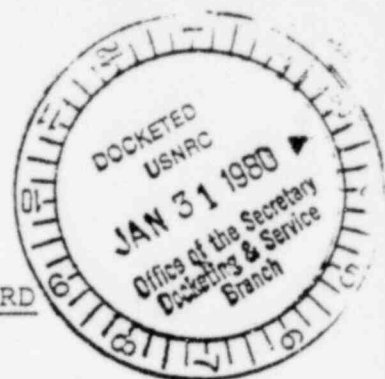
9) Are all management positions within GPU, GPUSC, and Met Ed presently filled? "Management" as used in this interrogatory and Interrogatory No. 10 shall be defined as person holding line supervisory positions and above.

10) For each management position not presently filled, state job description, name of the prior incumbent, reason for his termination, transfer or leave of absence and length of vacancy to date.

11) State in chronological sequence separately for TMI-1 and 2 the nature, date and disposition of every NRC-alleged or reported violation, infraction or other item of non-compliance with NRC regulations or technical specifications. For each such violation, infraction or non-compliance, state the name of the NRC inspector making the report, and the report number.

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))

RELATED CORRESPONDENCE

) Docket No. 50-289
) (Restart)
)

CERTIFICATE OF SERVICE

I hereby certify that I have caused to be forwarded the attached "Interrogatories to Licensee-Set-1" upon those persons as shown by the following Service List by deposit in the United States mail, postage prepaid, this 29th day of January, 1980.

John A. Levin
Assistant Counsel
Pennsylvania Public Utility
Commission

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

SERVICE LIST

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