

March 13, 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 OBJECTIONS TO THE SECOND  
SET OF AAMODT INTERROGATORIES  
DATED FEBRUARY 22, 1980

On February 22, 1980, the Aamodt family intervenors filed a second set of interrogatories requiring responses from Licensee. The interrogatories were identified by the Aamodt family as relating to their Contention No. 8. Because Licensee does not believe that the referenced interrogatories relate to Aamodt Contention No. 8, or to any other Aamodt contention accepted by the Licensing Board, Licensee objects to all of the Aamodt's second set of interrogatories.

As framed by the Aamodt family, Contention No. 8 stated:

It is contended that TMI-1 should not reopen until the management of radwaste has been totally resolved.

During the First Special Prehearing Conference Mr. Aamodt explained that this contention was intended to refer to short-term recommendation 5, as listed at pages 6-7 of the Commission's August 9, 1979 Order. See Tr. 453-57. That recommendation directs Licensee to demonstrate that its waste management capabilities are

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adequate to assure safe operation of TMI-1, and that TMI-1 waste handling capabilities are not relied upon by operations at TMI-2. So limited, the contention was accepted by the Licensing Board. First Special Prehearing Conference Order at 32 (December 18, 1979).

The interrogatories now proffered by the Aamodt family have nothing to do with Licensee's waste handling capabilities. Rather, the second set of interrogatories all address either radiation releases from Unit 1 operation or occupational exposures to radiation. These matters are not relevant to Aamodt Contentions No. 8 and are not likely to lead to the discovery of information relevant to Contention No. 8.

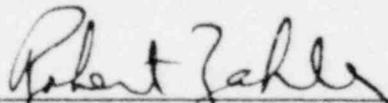
As a basis for the second set of interrogatories, the Aamodt family claims that the information is necessary in order to fashion a response to Licensee's Interrogatory Nos. 8-3 and 8-4. Those interrogatories inquired into whether the Aamodt family contended that Licensee's storage capacities and capabilities described in the Restart Report and assessed in the Staff's Status Report were adequate to resolve the concerns identified in Aamodt Contention No. 8. Those interrogatories can be answered fully and completely without information on radiation releases from Unit 1.

For these reasons, Licensee objects to Interrogatory Nos. 1 through 6 in the Second Set of Aamodt Interrogatories.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By: \_\_\_\_\_

  
Robert E. Zahler

Dated: March 13, 1980