

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 INTERVENOR
TMIA'S SEVENTH SET OF INTERROGATORIES

Licensee objects to the following interrogatories included in Intervenor Three Mile Island Alert, Inc. (TMIA)'s Seventh Set of Interrogatories:

Interrogatory No. 1. TMIA requests the social security number of certain former employees of Licensee. Licensee has already given to TMIA the last known address of each of these employees. The personal information which TMIA now seeks in Interrogatory No. 1 was given to Licensee by its former employees at the initiation of employment, solely for employment purposes. Licensee's former employees did not divulge this information to Licensee with any awareness or concurrence that it would be subject to public use. Furthermore, the social security numbers of former employees are irrelevant to the resolution of the issues in this proceeding. Consequently, such information is not properly the subject of discovery requests to Licensee and, generally, is beyond the scope of discovery.

Interrogatory No. 5. TMIA requests the names, addresses, and social security numbers of employees in specified departments at Three Mile Island (Units 1 and 2) who left Licensee's employment after March 28, 1979. Licensee objects to furnishing the social security numbers of the referenced employees for the reasons stated in Licensee's objections to Interrogatory No. 1.

Interrogatory No. 6. TMIA requests copies of all exit interview reports or sheets and/or all other written materials relating to the departure of employees in specified departments at Three Mile Island (Units 1 and 2) who left Licensee's employment after March 28, 1979. Licensee cannot provide to TMIA the termination questionnaire forms completed by its former employees without violating its commitment, as set forth on the first page of the questionnaire, that "Any information you provide will be kept confidential". Licensee therefore objects to the disclosure of these documents.

Respectfully submitted,
SHAW, PITTMAN, POTTS & TROWBRIDGE

Ernest L. Blake, Jr.

Ernest L. Blake, Jr.

Dated: March 17, 1980.

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Objections to Intervenor TMIA's Seventh Set of Interrogatories" were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 17th day of March, 1980.

Ernest L. Blake, Jr.

Ernest L. Blake, Jr.

Dated: March 17, 1980.

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SERVICE LIST

Ivan W. Smith, Esquire
Chairman
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Walter H. Jordan
Atomic Safety and Licensing
Board Panel
881 West Outer Drive
Oak Ridge, Tennessee 37830

Dr. Linda W. Little
Atomic Safety and Licensing
Board Panel
5000 Hermitage Drive
Raleigh, North Carolina 27612

James R. Tourtellotte, Esquire (4)
Office of the Executive Legal Director
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section (21)
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

John A. Levin, Esquire
Assistant Counsel
Pennsylvania Public Utility Comm
Post Office Box 3265
Harrisburg, Pennsylvania 17120

Karin W. Carter, Esquire
Assistant Attorney General
505 Executive House
Post Office Box 2357
Harrisburg, Pennsylvania 17120

John E. Minnich
Chairman, Dauphin County Board
of Commissioners
Dauphin County Courthouse
Front and Market Streets
Harrisburg, Pennsylvania 17101

Walter W. Cohen, Esquire
Consumer Advocate
Office of Consumer Advocate
14th Floor, Strawberry Square
Harrisburg, Pennsylvania 17127

Jordan D. Cunningham, Esquire
Attorney for Newberry Township
T.M.I. Steering Committee
2320 North Second Street
Harrisburg, Pennsylvania 17110

Theodore A. Adler, Esquire
Widoff Reager Selkowitz & Adler
Post Office Box 1547
Harrisburg, Pennsylvania 17105

Ellyn R. Weiss, Esquire
Attorney for the Union of Concerned
Scientists
Sheldon, Harmon & Weiss
1725 Eye Street, N.W., Suite 506
Washington, D.C. 20006

Steven C. Sholly
304 South Market Street
Mechanicsburg, Pennsylvania 17055

Gail Bradford
Holly S. Keck
Legislation Chairman
Anti-Nuclear Group Representing York
245 West Philadelphia Street
York, Pennsylvania 17404

Karin P. Sheldon, Esquire
Attorney for People Against
Nuclear Energy
Sheldon, Harmon & Weiss
1725 Eye Street, N.W., Suite 506
Washington, D.C. 20006

Robert Q. Pollard
609 Montpelier Street
Baltimore, Maryland 21218

Chauncey Kepford
Judith H. Johnsrud
Environmental Coalition on
Nuclear Power
433 Orlando Avenue
State College, Pennsylvania 16801

Marvin I. Lewis
6504 Bradford Terrace
Philadelphia, Pennsylvania 19149

Marjorie M. Aamodt
R. D. 5
Coatesville, Pennsylvania 19320