

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 RESPONSE TO FOURTH SET OF INTERROGATORIES
OF MARVIN I. LEWIS

INTERROGATORY NO. SP-28

The answer to SP-2 is not responsive. No attempt is made to answer the sentence, "Include where in the Restart Report this particular pathway is eliminated or repaired." Rather than go through the objection route, the expanded SP-2 is refiled as SP-28.

- (A) State which materials, filters, and items did not work as well as expected in the vent header and filters.
- (B) State the page number and the paragraph number in the Restart Report where this problem is investigated.
- (C) State the page number in the Restart Report where remedial action is described to eliminate each particular problem observed at TMI-2 from TMI-1 in the vent header and the filters.

The answer to SP-28 requires that page numbers be cited to be responsive.

RESPONSE

- (A) Pathway Analyses beyond those identified in response to SP-2 have not been completed. Licensee is continuing its evaluation of all significant accident pathways. Iodine filter performance is described in response to Interrogatory No. SP-9.

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- (B) These investigations are not described in the Restart Report.
- (C) Sections 7.3.3.2, and Table 2.1.4 discuss tests to be performed on these systems. Page numbers may change with additional amendments to the Restart Report and therefore only section numbers are provided.

INTERROGATORY NO. SP-29

The attachments for SP-5 and SP-12 are grossly inadequate. Intervenor Lewis sincerely hopes that these are not the size for lettering used on drawings distributed on site. The letters are so small as to be completely illegible. Resubmit working drawings as specified in SP-5 and SP-12 which meet the following guidelines: Lettering shall be of such a size that the smallest letter is easily read by a person with unaided 20-20 vision. Do not send a schematic as your entire attachment. Submit a working drawing which gives details such as duct work, assemblies, materials and instructions to workers.

RESPONSE

Full-sized drawings of the previously submitted Radwaste Gas System and the Auxiliary Building Ventilation System have been placed in Licensee's Discovery Reading Room. Licensee has reviewed the available drawings and did not find other relevant drawings.

INTERROGATORY NO. SP-30

Where did the data in SP-11 attachment A originate?

RESPONSE

The previously submitted attachment for SP-11 was furnished from test files and was produced by staff utilizing information in Report No. KEK-2449 (1977) by J. G. Wilhelm titled Iodine Filters in Nuclear Power Plants.

INTERROGATORY NO. SP-31

Intervenor Lewis cannot find index to drawings in Restart Report. It may have been mislaid. Instruct Gilbert Associates to send another index of drawings in Restart Report to 6504 Bradford Terrace, Philadelphia, Pa. 19149.

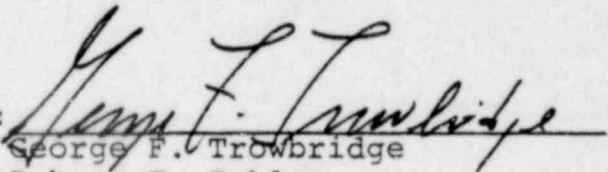
RESPONSE

No index to drawings in the Restart Report has been prepared.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By:


George F. Trowbridge
Robert E. Zahler

Dated: March 31, 1980

SHAW, PITTMAN, POTTS & TROWBRIDGE

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COUNSEL

*NOT ADMITTED IN D.C.

March 31, 1980

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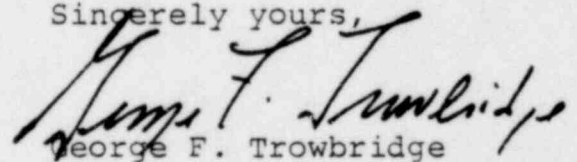
Re: Three Mile Island Unit 1
Docket No. 50-289 (Restart)

Dear Mr. Lewis:

I enclose Licensee's response to your fourth set of interrogatories. Copies of signed affidavits for these responses are not enclosed, but will be forwarded soon.

A copy of these materials is also being forwarded to Ms. Susan Barley, under separate cover.

Sincerely yours,


George F. Trowbridge

Enclosure

cc: Service List