

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	Docket No. 50-289
METROPOLITAN EDISON COMPANY)	(Restart)
)	
(Three Mile Island Nuclear)	
Station, Unit, No. 1))	

People Against Nuclear Energy
Interrogatories to Licensee Metropolitan Edison Co.

Pursuant to 10 CFR §2.740, Intervenor People Against Nuclear Energy (PANE) requests that these interrogatories be answered fully, in writing, and under oath by any employees or representatives of Metropolitan Edison Company (Licensee) who have personal knowledge of the facts or issues in question. The answer to each interrogatory should contain the name and identification of each person supplying or contributing to the answer, whether or not he or she has verified the answer. The answer should also explain the role of each individual in preparing the answer.

Definitions and Instructions

Unless otherwise indicated, the following definitions shall apply to these interrogatories:

1. Licensee shall include not only Metropolitan Edison, but also all agents, employees, attorneys, investigators, and all other persons directly or indirectly subject to the control of Metropolitan Edison or its parent companies in any way.

2. The words "person" or "persons" shall mean, without limitation, all entities, including all predecessors in interest, individuals, associations, companies, partnerships, joint ventures, corporations, subsidiaries, departments, bureaus, public agencies, and boards.

3. "Documents" shall mean all written or recorded material of any kind or character known to Licensee or in Licensee's possession, custody, or control, including, but not limited to letters, correspondence, telegrams, memoranda, notes, records, minutes, contracts, agreements, records of notations of telephone or personal conversations or conferences, inter-office communications, microfilm, bulletins, circulars, pamphlets, studies, notices, summaries, reports, books, articles, treatises, teletype messages, invoices, tape recordings and worksheets.

4. When used with respect to a document, "identify" means, without limitation, to state its date, the type of document (e.g., letter, memorandum, telegram, chart, photograph, sound reproduction, etc.), the author and addressee, the present location and the custodian, and a description of its comments.

5. When used with respect to a person, "identify" means, without limitation, to state his or her name, address, occupation, and professional qualifications.

6. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these interrogatories any information that

might otherwise be construed to be outside their scope.

7. If any of the information contained in the answers to any of these interrogatories is not within the personal knowledge of the person signing the response to that interrogatory, so state and identify each person, document, and communication on which he relies for the information contained in answers not based solely on his personal knowledge.

8. If the Licensee cannot answer any portion of the following interrogatories in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying the inability to answer the remainder and stating when the Licensee expects to be able to answer the unanswered portions.

9. These interrogatories are continuing interrogatories and require supplemental answers if the Licensee obtains further information between the time the answers are served and the time of an initial decision in the proceeding.

Interrogatories

1. Please state Licensee's position with respect to each of PANE's Contentions 1 and 2.

2. With respect to each of PANE's Contentions 1 and 2, please

- a. Identify each person whom Licensee expects to call as an expert witness concerning the contention;
- b. State the subject matter on which the expert witness is expected to testify;
- c. State the substance of the facts and opinions to which the expert witness is expected to testify,

expects to put into evidence or to rely upon in support of his or her testimony in this proceeding.

3. Please identify all other persons whom Licensee expects to call as witnesses concerning the issues raised by PANE's Contentions 1 and 2.

a. Please answer Interrogatory 2(a)-(e) with respect to each potential witness identified in response to this interrogatory.

4. With respect to all persons identified by Licensee in response to interrogatories 2 and 3, please

a. Provide a complete bibliography of all articles, books, or scholarly works published or presented by each person, including a brief description of the substance of each.

b. Identify and provide appropriate citations for all proceedings in which the person has previously appeared as a witness.

5. Please identify all persons with whom Licensee has consulted or expects to consult concerning each of PANE's Contentions 1 and 2 and who has knowledge of facts relating to either of those contentions.

a. For each person who has been consulted, state when he or she was consulted and summarize the substance of any facts or opinions communicated by such person to Licensee concerning the subject matter of PANE Contentions 1 and 2.

b. Please identify all documents or studies referred to by persons identified in response to

this interrogatory.

6. Identify all documents that Licensee expects to introduce into evidence or use for impeachment or other cross-examination purposes in this proceeding, other than those identified in response to other interrogatories.

7. Does Licensee deny that the accident at Three Mile Island Unit 2 caused any psychological or mental distress among people living near the reactor, and particular among those living within five miles of the reactor? What is the basis for this answer?

8. If Licensee does not deny that the accident caused some psychological or mental distress in the surrounding population,

1. Please explain what sort of stress Licensee believes was caused by the accident, whether that stress continues to exist, and what impact the reopening of TMI Unit 1 would have on persons suffering from that stress.

2. Please explain what actions Licensee intends are necessary to alleviate the mental stress caused by the accident.

3. Please explain what actions Licensee intends to take to alleviate the mental stress caused by the accident.

9. Is the Licensee's position that TMI Unit 1 should be allowed to reopen regardless of the severity of the psychological or mental stress that might be caused by the reopening?

10. Please identify all physicians, social workers, therapists, nurses, and other health professionals, both in the vicinity of TMI and elsewhere, whom Licensee has contacted concerning the issue of possible psychological or mental stress caused by the accident at TMI Unit 2 or that might be caused by reopening TMI Unit 1.

a. Please state when these contacts were made and summarize the substance of any facts or opinions communicated by these persons to Licensee.

b. Please identify and provide copies of all documents referred to by these persons or provided to Licensee by these persons.

12. Please identify and provide copies of all documents known to Licensee and sent to, received from, or otherwise relating to the following persons:

Dr. James Titchener
University of Cincinnati

Dr. E.L. Quarantelli
Ohio State University

Dr. Cal Fredericks
National Institute of Mental Health

Dr. Robert Jay Lifton
Yale University

Dr. Kai Ericson
Yale University

Dr. Evelyn Bromet
University of Pittsburgh

Dr. Martin Smith
Long Island University

Dr. Bruce P. Dohrenwend
Columbia University

Dr. Barbara Snell Dohrenwend
Columbia University

Dr. Stanislav V. Kasl
Yale University

Dr. George J. Warheit
University of Florida

Raymond L. Goldstein
Columbia University

13. Please identify and provide copies of all documents prepared by or known to Licensee which evaluate, contain Licensee's reaction to, or otherwise relate to or reflect the conclusion of the President's Commission on the Accident at Three Mile Island (the Kemeny Commission) that severe mental stress was the most serious health effect of the accident.

14. Please identify all real estate agents, brokers, and others knowledgeable about real estate transactions and prices in the vicinity of TMI, and all members of the business community, local government leaders, local government employees (including anyone employed by or connected with the school systems), and community leaders whom the Licensee has contacted or consulted concerning the issues raised by PANE's Contention 2.

a. Please identify and provide copies of all documents recording, reflecting, or otherwise related to the contacts with persons identified in response to this interrogatory.

15. Does Licensee know of anyone who has moved any distances away from the reactor as a result of the accident? Please identify all such persons.

15. Does Licensee know of anyone who has failed or refused to take up residence or open any type of business within a 20 mile radius of TMI as a result of the accident? Please identify all such persons.

17. Please identify all documents of which Licensee is aware that relate to the issues raised by PANE's Contentions 1 and 2 and have not previously been identified in response to these interrogatories.

18. Please identify all persons of whom Licensee is aware who have any knowledge of the facts or issues raised by PANE's Contentions 1 and 2 and who have not previously been identified in response to these interrogatories.

Respectfully submitted,

William S. Jordan, III (KPS)

William S. Jordan, III

Karin P. Sheldon

Karin P. Sheldon

Counsel for
PANE

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COMPANY, et al.)
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(Three Mile Island)
Nuclear Station, Unit)
No. 1))
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Docket No. 50-289
(Restart)

CERTIFICATE OF SERVICE

I hereby certify that a copy of "People Against Nuclear Energy Interrogatories to Licensee Metropolitan Edison Co." was mailed first class postage pre-paid this 28th day of March, 1980 to the following parties:

Secretary of the Commission
ATTN: Chief, Docketing and Service Section
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Washington, D.C. 20555

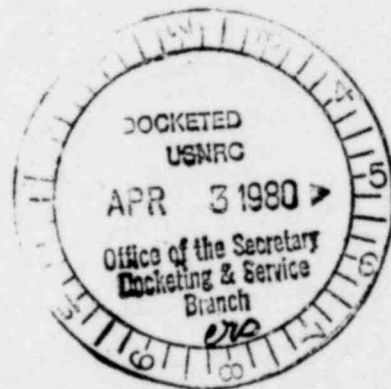
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