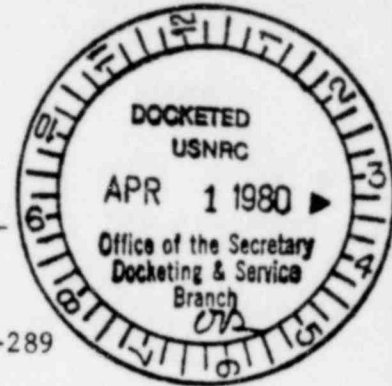


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
METROPOLITAN EDISON COMPANY)
(Three Mile Island Nuclear)
Station, Unit One))
)

Docket No. 50-289
(Restart)

ANTI-NUCLEAR GROUP REPRESENTING YORK FOLLOW-ON
INTERROGATORY TO COMMONWEALTH OF PENNSYLVANIA

Pursuant to authorization by the Board in its Fourth Special Prehearing Conference Order, p. 23, intervenor AntiNuclear Group Representing York hereby propounds follow-on interrogatories to the Commonwealth of Pennsylvania in regard to its response to ANGRY interrogatory #23(b).

40. Identify all reports, studies, or other documentation relied upon by the Commonwealth in providing this response.
- a. Specify the radiological release characteristics, particularly the source-release duration time, assumed in the first paragraph of the Commonwealth's response to interrogatory #23(b).
 - b. Specify any differences in the radiological release characteristics assumed in the first and third paragraphs, respectively, of the Commonwealth's response.
 - c. Under the conditions postulated would the Commonwealth make the emergency response recommendation set forth in paragraph 3 regardless of wind speed and warning time?
 - d. Were the emergency response recommendations set forth in paragraphs 1 and 3 of the Commonwealth's response based upon comparative dose reductions factor calculations for the alternative emergency response options of evacuation and sheltering, respectively? If yes, please attach copies of documentation in which such calculations are set forth. If no, explain in detail the bases for the Commonwealth's total rejection of sheltering as an appropriate emergency response under the postulated conditions.
 - e. Does the Commonwealth employ a system or procedure for emergency response selection equal or similar to that described in pages 35-51 of the document referenced at footnote #1(3) on page 55 of NUREG 0654? If yes please describe the system so employed by the Commonwealth in detail. If no, does the Commonwealth have any intention to adopt such a system or procedure?
 - f. Does the Commonwealth perceive any inconsistency between the emergency response recommendations it has set forth in paragraphs 1 and 3 of its response and the following language from page 1 of NUREG 0610:

The immediate action for this class (general emergency) is sheltering (staying inside) rather than evacuation until an assessment can be made that 1) an evacuation is indicated and 2) an evacuation, if indicated,

8004110095

can be completed prior to significant release and transport of radioactive material to the affected areas.

Explain in detail the bases for the Commonwealth's belief that under the postulated conditions its recommendation would afford greater protection to public health and safety than that quoted from NREG 0610.

Respectfully submitted,

Anti-Nuclear Group Representing York

By: John Bowers
John Bowers

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)

CERTIFICATE OF SERVICE

I hereby certify that I have this 27th day of March, 1980, served copies of the foregoing Follow-on Interrogatories to the Commonwealth of Pennsylvania ~~_____~~, on each of the following persons by deposit in the United States mail, postage prepaid.

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

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

Dr. Walter H. Jordan
881 W. Outer Drive
Oak Ridge, Tennessee 37830

James A. Tourtellotte, Esq.
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Linda W. Little
5000 Hermitage Drive
Raleigh, North Carolina 27612

George F. Trowbridge, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. @)))¢

Karin W. Carter, Esq.
Assistant Attorney General
505 Executive House
P.O. Box 2357
Harrisburg, Pennsylvania 17120

Holly S. Keck

Dated: March 27, 1980