

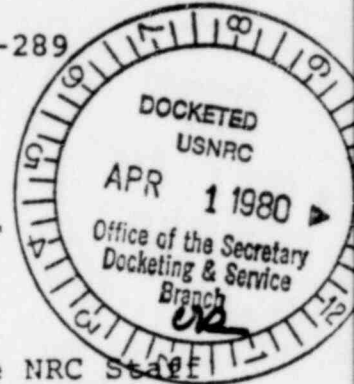
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

CEA:DIS:NRC-80-03.26

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
METROPOLITAN EDISON COMPANY)
(Three Mile Island, Unit 1))

Docket No. 50-289
(Restart?)



CHESAPEAKE ENERGY ALLIANCE INTERROGATORIES TO NRC STAFF
FOR ITS PSYCHOLOGICAL DISTRESS CONTENTION

CEA hereby submits the following interrogatories to the NRC Staff on its Contention No. 4. CEA notes that the Board has ruled on 3/13/80 that this contention is to be limited to the 'psychological distress' component, which CEA understands to mean that it is limited to the public's perception of the credibility or validity of the monitoring system for offsite radiation, as opposed the validity itself of the monitoring.

CEA requests that the attached interrogatories be answered fully, in writing, and under oath by any members of the NRC Staff who have personal knowledge thereof. The answer to each interrogatory should contain the name(s) and identification of the person(s) supplying the answer, and whether or not he or she has verified the answer.

CEA requests that whenever a document is referenced that has been served on CEA during these proceedings, an asterisk (*) be placed beside the reference. CEA furthermore requests that whenever a document or section of a document is referenced that is not more than five (5) pages in length, a copy of that document or section of that document be enclosed with the answer.

Interrogatories:

- 4-1 Summarize and explain the NRC Staff position on this contention. Identify all documents relied on in reaching that position.
- 4-2 Identify those aspects of the contention that NRC Staff considers to be matters of controversy. For each of those aspects, summarize briefly the opposing positions on the controversy as it is perceived by NRC Staff. Identify and summarize all documents in support of either position.
- 4-3 Identify and briefly summarize any and all documents known to the NRC Staff that would tend to provide evidence and/or support for the contention.
- 4-4 Identify any and all persons known to the NRC Staff who have knowledge or expertise that would tend to support this contention. For each such person, provide name, address, telephone number, and qualifications, and a summary of the nature of the evidence expertise that person would be able to offer.

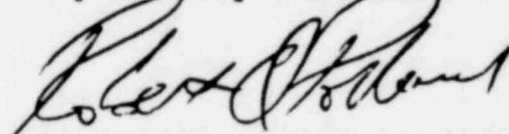
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- 4-5 Identify any and all experts that the NRC Staff intends to have testify on the contention; state the qualifications of each expert; and present a summary of the testimony that each expert is expected to provide.
- 4-6 Identify any and all members of the NRC Staff who dissent from the overall NRC Staff position on this contention, and for each such person, provide a summary of their dissenting position on the contention.
- 4-7 Identify the critical or central parameters of this contention as it is perceived and understood by NRC Staff, and briefly evaluate the NRC Staff's evaluation of the importance of each such parameter.
- 4-8 Identify any and all documents that have been prepared or commissioned by or for the NRC Staff to investigate the credibility, as perceived by the public within the general vicinity (whether that be a ten mile radius, surrounding townships or counties, or other boundary) of TMI, of Licensee, or agents of Licensee, whether that credibility be of a general nature, or specifically in respect to the accuracy of reported offsite radiation levels. Identify the authors of each such document, and their qualifications.
- 4-9 Identify any and all reports known to the NRC Staff, including reports in newspapers and media in the TMI area, that show evidence that there is, or has been since 3/28/79, any substantial lack of public trust in the credibility or validity of reports on the TMI-2 accident by Licensee, whether those reports do or do not specifically involve reports on the levels of offsite radiation.
- 4-9 Identify and describe any measures that are known to NRC Staff to have been taken to address any lack of public credibility in Licensee's reports, whether they involve specifically offsite radiation levels or not. Identify the persons or agencies that have taken those measures, and also describe any observable consequences of those measures.
- 4-10 Describe any and all steps that may have been taken to assemble a truly independent (both of Licensee and of NRC) means of measuring and reporting offsite radiation levels, including in that description the steps that have been taken to establish that such an independent means of monitoring and reporting offsite radiation levels would have the confidence of the public in the TMI area.
- 4-11 Insofar as the public credibility of Licensee is related to the public's perception (in the TMI area) of the NRC itself (as the agency responsible for regulating Licensee), identify any and all evidence that shows or tends to show a lack of public confidence in the actions and/or statements of the NRC. Describe the nature of such evidence, and the persons reporting such evidence.

- 4-12 Identify and describe any and all evidence, reports, and documents known to the NRC Staff that pertain specifically to the public's lack of credibility in Licensee's reports of offsite radiation levels, to the specific components and bases for the public's lack of confidence in Licensee's reports of offsite radiation levels, and to the remedies that are perceived by the public to be necessary for the public to have full confidence in reports of offsite radiation levels. Describe the nature of all such evidence, and the author(s) of all reports and documents cited.
- 4-13 Describe any and all action taken or planned by NRC Staff to address the lack of public confidence in Licensee's reports of offsite radiation levels. Describe the timetable for such action, and identify the person(s) who will be responsible for implementing the action.

Respectfully submitted



CHESAPEAKE ENERGY ALLIANCE, INC
By Robert Q. Pollard

Dated: March 26, 1980