



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

April 15, 1980

William S. Jordan, Esq.
Karen P. Sheldon, Esq.
Sheldon, Harmon & Weiss
1725 I Street, N.W.
Washington, D.C. 20006

Dear Mr. Jordan and Ms. Sheldon:

I am in receipt of interrogatories posed by People Against Nuclear Energy (PANE) to the NRC Staff dated March 31, 1980. Although some responses will be sent within a few weeks, the Staff is unable to answer many of the interrogatories at this time.

As you know, the Commission has not yet ruled on whether psychological stress issues will be heard in the TMI-1 proceeding. Because of this uncertainty, the Staff has been hesitant to begin a review or analysis of the issue. Consequently, interrogatories which ask for the Staff's position, for experts to be called as witnesses, and for documents to be introduced into evidence cannot be answered until a review of the psychological stress issue is initiated.

Other interrogatories which ask for the names of persons contacted by the Staff in relation to psychological stress problems and for the types of stress found by the Staff will take some time to compile. This information, however, will be sent as soon as it becomes available.

The Staff is concerned with PANE's definition of "Staff" which includes "all agents, employees, attorneys, investigators, and all other persons directly or indirectly subject to the control of the Nuclear Regulatory Commission Staff." This definition is overly broad and would require the Staff to spend enormous amounts of time answering the interrogatories. As a solution to this problem the Staff proposes to answer each interrogatory from the viewpoint of the NRC technical Staff, legal Staff, and contractors. This approach should be sufficient to respond to PANE's concerns.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lucinda Low Swartz".

Lucinda Low Swartz
Counsel for NRC Staff

cc: Ivan W. Smith, Esq., Chairman
Dr. Walter H. Jordan
Dr. Linda W. Little

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