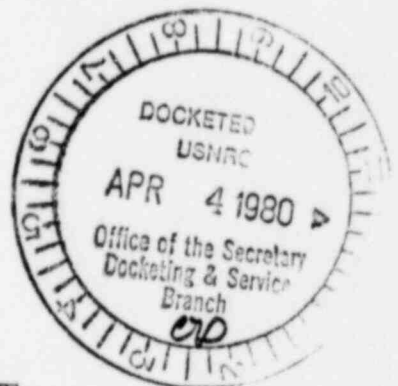


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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



STATEMENT OF COMMONWEALTH OF PENNSYLVANIA
IN SUPPORT OF AAMODT REQUEST FOR EXTENSION OF TIME

In a motion dated March 26, 1980, Mrs. Marjorie Aamodt requested an extension of time until April 17, 1980, for follow-on interrogatories and depositions. While the Commonwealth certainly has no objection to her request, we think that Mrs. Aamodt needs to recalculate the time involved for responses and ask the Board to give her - and the Commonwealth - an even later deadline than April 17, if she really desires to make efficient use of such discovery methods. One element in the recalculation should be the fact that the Commonwealth was not served with a reproducible copy of Mrs. Aamodt's third set of interrogatories until March 19, although it was served with a barely legible copy one or two days earlier. The Commonwealth expects to be filing its answers to this set of interrogatories in a timely fashion, this week (most probably on April 2). If Mrs. Aamodt wishes to file follow-on interrogatories regarding this set of answers, she would be able to serve them on the Commonwealth no earlier than Monday, April 7. If we spend 14 days answering these interrogatories, Mrs. Aamodt would receive them no

earlier than April 22, which is later than the April 17 deadline.

In addition, the Commonwealth was served on March 27, 1980 with Mrs. Aamodt's follow-on interrogatories to her first two sets of interrogatories to the Commonwealth. Considering the number of individuals and agencies involved in answering these follow-on interrogatories, the Commonwealth is going to have to exert considerable effort just to answer all these interrogatories and document requests by April 10, which would be the 14-day deadline. Mrs. Aamodt would receive these responses either on April 11 or April 14. If Mrs. Aamodt mails her notice of deposition immediately thereafter, a thirty-day period for arranging the depositions (which we would need if many individuals are involved) would fall on approximately May 15.

The Commonwealth believes that Mrs. Aamodt has been diligent - as has the Commonwealth - in trying to use the discovery process in a manner which would help create a full and complete record. We also note that Mrs. Aamodt alone has conducted discovery on the Commonwealth on agricultural issues (although ANGRY has also asked for and received the Commonwealth's Department of Agriculture emergency plan).

The Commonwealth has discussed the foregoing in a recent telephone call to Mrs. Aamodt, and we urged her to rethink her schedules and revise her request. The Commonwealth, of course, is under no legal obligation under NRC rules to respond to discovery requests. However, we would urge the Board, when ruling on Mrs. Aamodt's request for extension, to assume that the Commonwealth will be responding to interrogatories and document requests in the same fashion as it has heretofore in the proceedings, and we will do our best to abide by any revised schedule which the Board might impose on Mrs. Aamodt. By the same token, we would ask the Board to recognize that with respect to Mrs.

Aamodt's discovery, several state agencies and individuals have been involved in formulating responses, and that the 14-day deadline for interrogatories and 30-day deadlines for documents and arranging of depositions are barely enough.

Respectfully submitted,

Karin W. Carter

KARIN W. CARTER

Assistant Attorney General

Counsel for the Commonwealth of Pennsylvania

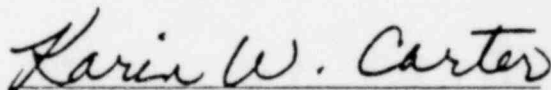
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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: METROPOLITAN EDISON COMPANY, :
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CERTIFICATE OF SERVICE

I hereby certify that copies of the Statement of Commonwealth of Pennsylvania in Support of Aamodt Request for Extension of Time were served upon those persons on the attached Service List by deposit in the United States Mail, postage prepaid, this 31st day of March, 1980.


KARIN W. CARTER
Assistant Attorney General

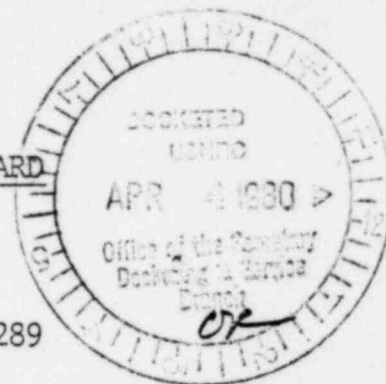
Dated: March 31, 1980

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 No. 1))

Docket No. 50-289
(Restart)



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