# SHAW, PITTMAN, POTTS & TROWBRIDGE

IBOO M STREET, N. W. WASHINGTON, D. C. 20036

RAMSAY D. POTTS
STEUART L. PITTMAN
GEORGE F. TROWBRIDGE
STEPHEN D. POTTS
GERALD CHARNOFF
PHILLIP D. BOSTWICK
R. TIMOTHY HANLON
GEORGE M. ROGERS, JR.
JOHN B. RHINELANDER
BRUCE W. CHURCHILL
LESLIE A. NICHOLSON, JR.
MARTIN D. KRALL
JAY E. SILBERG
BARBARA M. ROSSOTTI
GEORGE V. ALLEN. JR.
WM BRADFORD REYNOLDS
FRED DRASNER
HATHANIEL P. BREED, JR.
MARK AUGENBLICK
ERNEST L. BLAKE, JR.
CARLETON S. JONES
THOMAS A. BAXTER
JAMES M. GURGER
SHELDON J. WEISEL
JOHN A. MCCULLOUGH
J. PATRICK HICKEY
JAMES THOMAS LENHART
STEVEN L. MELTZER
DEAN D. AULICK
JOHN ENGEL

STEPHEN B. HUTTLER
WINTMROP N. BROWN
JAMES B. HAMLIN
ROBERT E ZAHLER
RICKARD E. GALEN
ROBERT B. ROBBINS
STEVEN M. LUCAS
MATIAS F. TRAVIESO-DIAZ
VICTORIA J. PERKINS
JOHN H. O'NEILL, JR.
JAY A. EPSTIEN
TIMOTHY B. MCBRIDE
ELISABETH M. PENDLETON
LUCY G. ELIASOF
PAUL A. KAPLAN
HARRY H. GLASSPIEGEL
THOMAS H. McCORMICK
SUSAN D. FALKSON
WILLIAM P. BARR
JOHN L. CARR, JR.
PHILIP J. HARVEY
ROBERT M. GORDON
JEANNE A. CALDERON
BARBARA J. MORGEN®
BONNIE S. GOTTLIEB
ALFRED M. POSTELL
SETH H. HOOGASIAN
SHEILA E. McCAFFERTY
DELISSA A. RIDGWAY
KENNETH J. HAUTMAN
DAVID LAWRENCE MILLER

BELATED CORRESPONDENCE

TELECOPIER (202) 296-0694 & 296-1760

TELEX 89-2693 (SHAWLAW WSH) CABLE "SHAWLAW"

EDWARD B. CROSLAND

May 14, 1980



NOT ADMITTED IN D.C.

Karin P. Sheldon, Esquire
Attorney for People Against
Nuclear Energy
Sheldon, Harmon & Weiss
1725 Eye Street, N.W.
Suite 506
Washington, D.C. 20006

Re: Three Mile Island, Unit 1 Docket No. 50-289 (Restart)

Dear Ms. Sheldon:

Enclosed is the Affidavit of John R. Thorpe in support of Licensee's Response to PANE Interrogatories, filed on May 5, 1980.

Sincerely yours,

Deborah L. Bernstein Counsel for Licensee

Deborah L. Bernstein

Enclosure cc: Service List

### 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 ) (Restart)
(Three Mile Island Nuclear Station, Unit No. 1)	)

### AFFIDAVIT OF JOHN R. THORPE

State of New Jersey ) ss: Country of Morris )

JOHN R. THORPE, being duly sworn according to law, deposes and says that he is the Director-Environment, Health and Safety of General Public Utilities Service Corporation, that the information contained in Licensee's May 5, 1980 response to all PANE interrogatories are true and correct to the best of his knowledge and belief.

John R. Thorpe Director-Environment, Health and Safety

Sworn to and subscribed before me this 4 day of 7 a. 1980

otary Public

MOTARY PURILS OF NEW JERSEY

My Commission Expires: My Commission Empires March 7, 1985

### 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)

#### SERVICE LIST

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

Dr. Walter H. Jordan Atomic Safety and Licensing Board Panel 881 West Outer Drive Oak Ridge, Tennessee 37830

Dr. Linda W. Little
Atomic Safety and Licensing
Board Panel
5000 Hermitage Drive
Raleigh, North Carolina 27612

James R. Tourtellotte, Esquire (4)
Office of the Executive Legal Director
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section (21)
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

John A. Levin, Esquire
Assistant Counsel
Pennsylvania Public Utility Comm'n
Post Office Box 3265
Harrisburg, Pennsylvania 17120

Karin W. Carter, Esquire Assistant Attorney General 505 Executive House Post Office Box 2357 Harrisburg, Pennsylvania 17120

John E. Minnich
Chairman, Dauphin County Board
of Commissioners
Dauphin County Courthouse
Front and Market Streets
Harrisburg, Pennsylvania 17101

Walter W. Cohen, Esquire Consumer Advocate Office of Consumer Advocate 14th Floor, Strawberry Square Harrisburg, Pennsylvania 17127 Jordan D. Cunningham, Esquire Attorney for Newberry Township T.M.I. Steering Committee 2320 North Second Street Harrisburg, Pennsylvania 17110

Theodore A. Adler, Esquire Widoff Reager Selkowitz & Adler Post Office Box 1547 Harrisburg, Pennsylvania 17105

Ellyn R. Weiss, Esquire
Attorney for the Union of Concerned
Scientists
Sheldon, Harmon & Weiss
1725 Eye Street, N.W., Suite 506
Washington, D.C. 20006

Stever C. Sholly 304 South Market Street Mechanicsburg, Pennsylvania 17055

Gail Bradford
Holly S. Keck
Legislation Chairman
Anti-Nuclear Group Representing York
245 West Philadelphia Street
York, Pennsylvania 17404

Karin P. Sheldon, Esquire
Attorney for People Against Nuclear
Energy
Sheldon, Harmon & Weiss
1725 Eye Street, N.W., Suite 506
Washington, D.C. 20006

Robert Q. Pollard 609 Montpelier Street Baltimore, Maryland 21218

Chauncey Kepford
Judith H. Johnsrud
Environmental Coalition on Nuclear
Power
433 Orlando Avenue
State College, Pennsylvania 16801

Marvin I. Lewis 6504 Bradford Terrace Philadelphia, Pennsylvania 19149

Marjorie M. Aamodt R. D. 5 Coatesville, Pennsylvania 19320