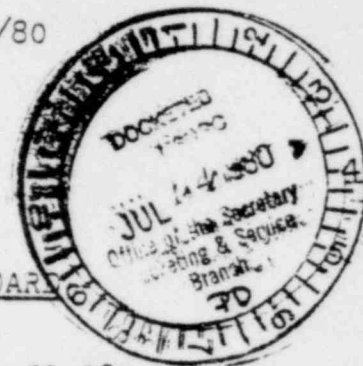


ANGRY 7/8/80

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of  
METROPOLITAN EDISON CO.  
ET AL.

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)  
)

Docket No. 50-289

MOTION TO THE BOARD TO COMPEL LICENSEE TO SERVE THE "EMERGENCY PLAN IMPLEMENTING DOCUMENT" TO THE ANTI-NUCLEAR GROUP REPRESENTING YORK

As the Board agreed at the first Special Prehearing Conference in November, 1979. "the development and effectuation of adequate and effective Emergency Response Plans by the Licensee and by state and local governmental units are necessary for the public health and safety to be adequately protected and therefore should be made a pre-condition to the restart of TMI-1." The Board will remember this as ANGRY's Contention 1, which was ruled a statement no one would disagree with. ANGRY submits that the existence of any plan, no matter how good does nothing to protect the public health and safety in time of emergency unless the plan can<sup>2</sup> and is implemented effectively. For this reason we request that the Board require the Licensee to furnish all portions of the Implementing Document so that we may review the means by which the Licensee intends to effectuate its Emergency Plan. Our request specifically includes all portions of the Implementing Document, including those sections which have been reviewed by the Licensee's "PORC" and those sections which have not yet been reviewed by "PORC."

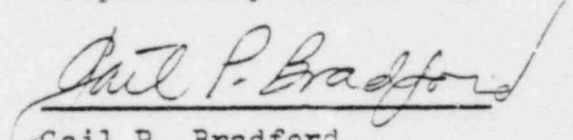
Having the portions of the Implementing Document that have been reviewed by "PORC" drift into ~~the~~ Licensee's Discovery Reading Room as they are completed is not very helpful to us. How can we tell when a new portion has arrived? Like all other parties, we are now snowed with reading material and do not have the time to travel to Middletown on the chance that a new section may have been put out. Unless the Board is willing to delay the Emergency Planning schedule further, which we have no objection to, the Licensee should produce

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the entire Document as is and send revisions as they are completed by "PORC." As the Board will understand, having the Regulations and the Emergency Plans change as they have requires quite a bit of work if we are to do our job properly as we intend; we need access, prompt and complete access to the documents in the case.

July 8, 1980.

Respectfully submitted,

A handwritten signature in cursive script that reads "Gail P. Bradford". The signature is written in dark ink and is positioned above a horizontal line.

Gail P. Bradford,  
legal coordinator for  
ANGRY. 717/843-7705