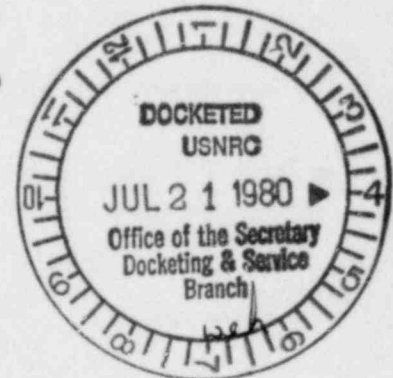


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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))	

LICENSEE'S OBJECTIONS TO
TMIA'S "FOLLOW-UP" INTERROGATORIES
BASED ON THE JUNE 27 10,000 GALLON LEAK



On July 7, 1980 Three Mile Island Alert ("TMIA") filed a document entitled "TMIA's Follow-Up Interrogatories Based On The 10,000 Gallon Leak of Contaminated Water On June 27, 1980 To Licensee." Licensee objects to the interrogatories.

Though TMIA denominates the interrogatories as "follow-up" interrogatories, the interrogatories do not comply with the controlling Board order on follow-on discovery. The interrogatories are not "clearly tied (by express reference) to . . . [a prior given] response" of Licensee to discovery. See "Fourth Special Prehearing Conference Order," (slip op. at 23-24) (February 29, 1980). Absent TMIA's identification of such prior response by Licensee, Licensee is unable to assess either the timeliness or relevance of TMIA's July 7 "follow-on" interrogatories.

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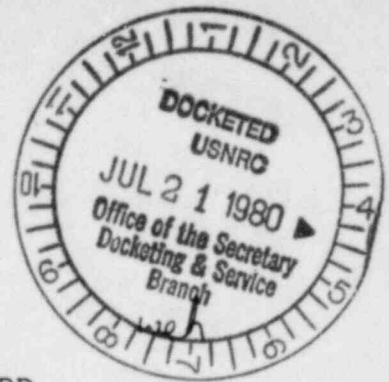
The Board's May 5, 1980 "Memorandum and Order," which TMIA cites as authority for the promulgation of its July 7 interrogatories, does not even address the subject of follow-on interrogatories. Rather, the May 5 "Memorandum and Order" establishes a schedule for the filing of discovery requests and new contentions based upon "new information." Assuming that TMIA intended to treat the June 27 leak as "new information," Licensee still objects to the July 7 interrogatories as irrelevant and overly broad. TMIA does not explain how the requested information relates to TMIA's remaining contentions or how it could be said to be reasonably calculated to lead to relevant information.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By: Ernest L. Blake, Jr.
Ernest L. Blake, Jr.

Dated: July 17, 1980



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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Objections To TMIA's 'Follow-Up' Interrogatories Based On The June 27 10,000 Gallon Leak" were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 17th day of July, 1980.

Ernest L. Blake, Jr.

Ernest L. Blake, Jr.

Dated: July 17, 1980

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NUCLEAR REGULATORY COMMISSION

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In the Matter of)
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Station, Unit No. 1))

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