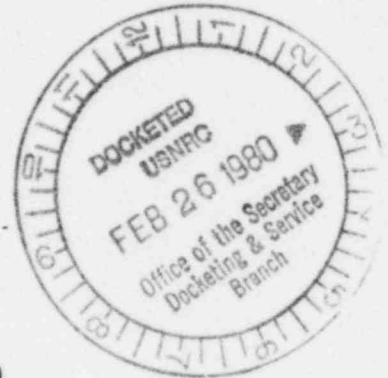


February 25, 1980

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

LICENSEE'S OBJECTIONS TO FIRST SET OF INTERROGATORIES FROM  
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

In accordance with the revised discovery schedule (see  
Memorandum on Revised Discovery Schedule, dated February 20, 1980),  
Licensee raises the following objection to the first set of inter-  
rogatories from the Pennsylvania Public Utility Commission:

Interrogatory No. 6

Have any cash flow studies been prepared by or for Met  
Ed? If so, state by whom they have been prepared, the dates of  
preparation and source and nature of assumptions used. Attach  
copies or verbatim summaries thereof.

Objection

Licensee objects to this interrogatory on the grounds  
that is is unlimited in scope and time frame. The requirement  
that Licensee identify and provide copies of all cash flow studies  
that have been prepared by or for Metropolitan Edison will result  
in producing voluminous information that is unrelated to the  
financial qualification matter that is at issue in the proceeding.

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Licensee does not object to identifying its most recent cash flow and short-term debt forecasts, and will do so in its response to the interrogatory.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By: Robert E. Zahler  
Robert E. Zahler  
Counsel for Licensee

Dated: February 25, 1980

February 25, 1980

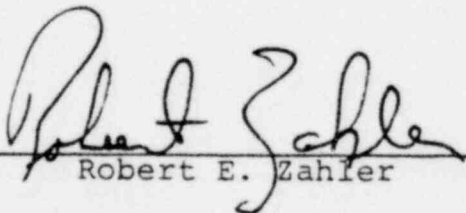
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Objections to First Set of Interrogatories from the Pennsylvania Public Utility Commission", were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 25th day of February, 1980.

  
Robert E. Zahler

Dated: February 25, 1980

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)	)	

SERVICE LIST

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