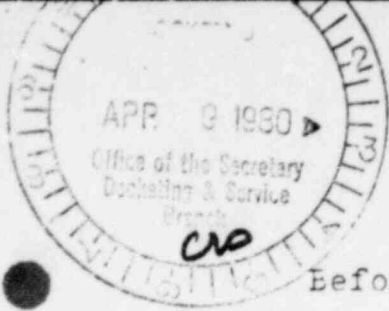


April 7, 1980



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 1, Docket 50-289

AAMODT REQUEST FOR FURTHER EXTENSION OF TIME RELATIVE TO
DEPOSITION OF COMMONWEALTH OF PENNSYLVANIA

The motion made of the Board concerning extension of time needed for follow-up interrogatories and depositions of the Commonwealth was granted as requested, until April 17, 1980, however it now appears to be a schedule that cannot be met. The Commonwealth has supported our motion in a statement dated March 31, 1980, however it has been pointed out that the extension which we requested is too brief to accomplish what was planned, and we are now in agreement. The answers to the Aamodt third set of interrogatories have not been received to date, due to several factors that were not within the Commonwealth's control. To develop a complete record, we wish to follow-up on those responses, if necessary. Additionally, a fourth set of interrogatories served April 7, 1980 regarding the agricultural plan need to be answered and follow-up may be necessary. Following the reasoning set forth by the Commonwealth, approximately 18 days need to be allowed for receipt of responses, which includes the 14 day deadline plus two days for each mailing. The Commonwealth's responses to the fourth set should be received by April 25; if five days are allowed for our follow-up, responses should be received from the Commonwealth within 23 days of April 25, which closest postal delivery date is May 19. Allowing five days for examination of responses, then we would be able to decide whether the answers provided were sufficient to prepare for the hearing of the related contentions, or if

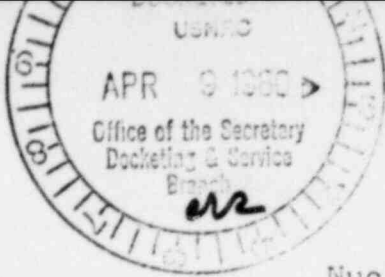
depositions were needed. If we then did not wish to take depositions of the Commonwealth, we would provide notice as soon as it became evident to us, but no later than May 29, allowing in addition to five days for examination, another five days for postal delays not provided for in the "eighteen days" between request and receipt of interrogations of the Commonwealth. If, however, we did need to take depositions, we would make request of the Commonwealth promptly, possibly as early as May 25, but no later than May 29. The Commonwealth has reminded us of the 30 day period that may be needed for arranging depositions, therefore, it appears that an extension for completion of depositions is needed for 30 days beyond May 29, which is approximately June 29. We are, therefore, requesting an additional extension until May 29 for noticing depositions and until June 29, 1980 for completion of depositions of the Commonwealth.

Respectfully submitted,

Marjorie M. Aamodt

Marjorie M. Aamodt

Dated: April 7, 1980



April 7, 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
Unit 1, Docket 50-289

CERTIFICATE OF SERVICE

I hereby certify that AAMODT INTERROGATIEL OF COMMONWEALTH OF PENNSYLVANIA -- FOURTH SET was served on those persons on the attached service list by deposit in the United States mail, postage prepaid, this seventh day of April, 1980.

Marjorie M. Aamodt
Marjorie M. Aamodt

Dated: April 7, 1980

I hereby certify that AAMODT REQUEST FOR FURTHER EXTENSION OF TIME RELATIVE TO DEPOSITION OF COMMONWEALTH OF PENNSYLVANIA was served on those persons on the attached service list by deposit in the United States mail, postage prepaid, this seventh day of April, 1980.

Marjorie M. Aamodt
Marjorie M. Aamodt

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

George F. Trowbridge, Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036

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 A. Tourtellotte, Esquire
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

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