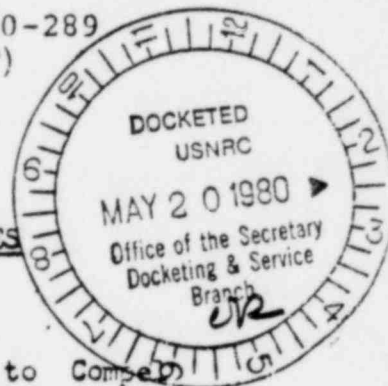


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
METROPOLITAN EDISON COMPANY)
)
(Three Mile Island, Unit 1))

Docket No. 50-289
(Restart?)



CEA'S FURTHER RESPONSE TO LICENSEE'S FIRST SET OF INTERROGATORIES


Following the Board's Memorandum and Order on Licensee's Motion to Compel Discovery of CEA (April 16, 1980), CEA hereby submits the following further responses to Licensee's First Set of Interrogatories. Wherever it is stated below that CEA's response is changed to read ..., the change shall be from CEA's Response to Licensee's First Set of Interrogatories (80.03.17).

- 5-1 CEA's response is changed to read "tanks and pipes with .."
 (a) CEA is not presently able to identify specific TMI-1 accidents that would require use of TMI-2 storage space.
 (b) See (a) above.
 (c) See (a) above.
- 5-2 CEA is not presently able to identify specific potential accidents at TMI-2 during decontamination and clean-up.
- 5-3 See 5-2 above.
 (a) See 5-3 above
 (b) See 5-3 above
 (c) See 5-3 above
- 5-4 The TMI-2 Weekly Status Report, dated April 14, 1980 (TMI-NRC 80 reports that EPICOR II "was started on April 7, 1980 ...after an extensive outage for several modifications ..." (emphasis added). CEA notes that this statement appears to be in direct conflict with Licensee's response to CEA's Interrogatory 5-9 stating that EPICOR-II has operated "as projected" and "as originally scheduled". The Board is correct in its perception that CEA doesn't know the names and dates of the news reports it had cited.
- 5-5 CEA's response is changed to read "The claim is based ..."
- 6-1 The basis for CEA's claim is substantiated by Licensee's response to CEA's Interrogatory 6-7, and by NRC Staff's response to CEA's Interrogatory 6-8.
 (b) CEA, like Licensee (in its response to CEA's 6-7), is not able to determine the location of the leakage sources.
 (c) To the best of CEA's knowledge, the leakage is into the Containment Building of TMI-2. Until further sampling of radioactivity in wells bored below TMI-2 is completed, it is not clear whether there is subsequent leakage from the containment building.
 (d) The aggregate rate of leakage is between 0.2 and 0.5 gallons per minute.

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- 7-1 CEA is not convinced that the separation of TMI-1 and TMI-2 is adequate to resolve its concerns.
- (a) CEA is not presently able to specify particular inadequacies in the proposed physical separation of TMI-1 and TMI-2.
 - (b) See (a) above.
 - (c) See (a) above.
 - (d) See (a) above.
- 7-2 CEA is not convinced that the Safety Evaluation performed by NRC Staff is adequate to meet its concerns.
- (a) CEA is not presently able to specify any particular inadequacies in the Safety Evaluation performed by NRC Staff.
 - (b) See (a) above.
 - (c) See (a) above.
 - (d) See (a) above.
- 8-1 CEA is not presently able to identify other specific examples of the inadequacy of licensee's management capability.
- (a) See 8-1 above.
 - (b) See 8-1 above.
 - (c) See 8-1 above.
- 12-2 CEA is not presently able to specify particular accidents that are credible and that are not bounded by the TMI-1 design basis accidents.
- 12-3 See 12-2 above.
- 12-4 See 12-2 above.

Respectfully submitted


Robert Q. Pollard, for
CHESAPEAKE ENERGY ALLIANCE, INC.

Dated: April 26, 1980