

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

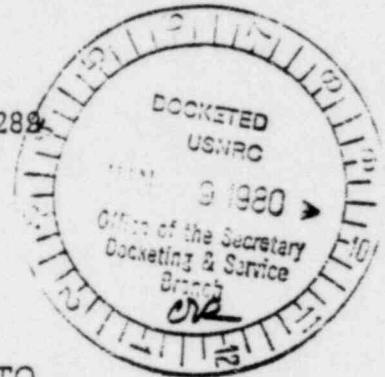
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

METROPOLITAN EDISON COMPANY )

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

Docket No. 50-289  
(Restart)



TMIA'S RESPONSE TO LICENSEE'S MOTION TO  
REQUIRE FURTHER SPECIFICATION OF CONTENTIONS

TMIA has always believed that the Safety Evaluation Report (SER) will contain significant information previously unavailable. TMIA expects this new information to be essential in developing its contentions. The importance of the SER has been expressed previously by TMIA in its answers to Licensee's interrogatories and by the Board in its past decisions.

Particularly, the Board's Memorandum and Order dated May 5, 1980 (outlining the procedure following the issuance of the SER) indicates that the Board is sensitive to the importance of the SER in the development of the intervenor's contentions.

An order to further specify contentions before the issuance of the SER would unjustifiably reduce TMIA's ability to fully develop its contentions and will thus prevent the Board from establishing a complete record.

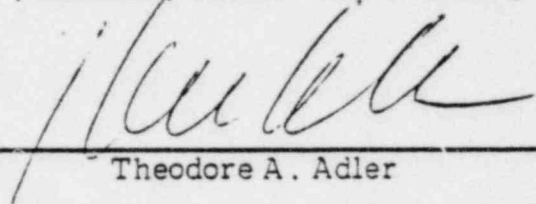
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Therefore, TMIA requests that the Board reject Licensee's Motion To  
Require Further Specification Of Contentions and reaffirm the position taken in  
its Order of May 5, 1980.

Respectfully submitted,

WIDOFF, REAGER, SELKOWITZ & ADLER, P.C.

By: \_\_\_\_\_

  
Theodore A. Adler

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Dated: June 6, 1980

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing document, TMIA's Response To Licensee's Motion To Require Further Specification Of Contentions, to be placed in the United States mail, first-class, postage prepaid, addressed to the persons listed below:

Ivan W. Smith, Chairman  
Atomic Safety & Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

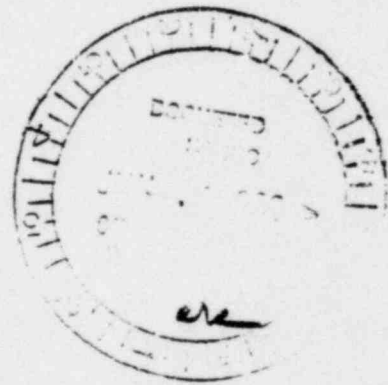
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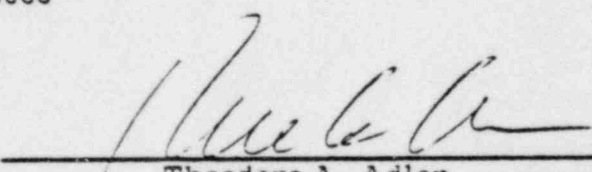
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Theodore A. Adler

Dated: June 6, 1980