

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

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Docket No. 50-289

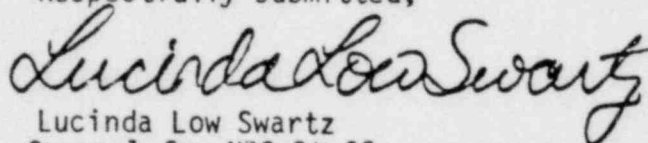
SECOND SET OF NRC STAFF INTERROGATORIES OF
MARVIN I. LEWIS

Pursuant to 10 C.F.R. § 2.740b, the following interrogatories are directed to Marvin I. Lewis. Each interrogatory is to be answered separately and fully in writing under oath or affirmation by individuals having personal knowledge of the answers. The Licensing Board in this proceeding has directed that all responses to interrogatories must be in the hands of the discovering party 35 days after the issuance of the SER (July 21, 1980). (The Memorandum and Order on Prehearing Conference of May 13, 1980 (May 22, 1980), at 7.)

All parties are reminded that § 2.740(e) of the Commission's regulations requires parties to amend their responses when they are no longer true. Thus, intervenors who were not able to answer the general interrogatories submitted in the "First Set of NRC Staff Interrogatories to Intervenors" dated December 27, 1979 or the interrogatories submitted in this pleading are obligated to respond to the interrogatories upon receipt of the requested information.

All of the specific interrogatories attached refer to information contained in the Staff's "TMI-1 Restart Evaluation of Licensee's Compliance with the Short-and Long-Term Items of Section II of NRC Order dated August 9, 1979" (SER) which was served on all parties to this proceeding on June 16, 1980. Page numbers in the interrogatories refer to the SER. The general interrogatories inquire into how the parties intend to use documents, including the SER, in their presentations of evidence.

Respectfully submitted,



Lucinda Low Swartz
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 1st day of July, 1980.

Marvin I. Lewis

GENERAL INTERROGATORIES

1. Identify by author, title, date of publication and publisher, all books, documents, and papers you intend at this time to employ or rely upon in presenting your direct case on the "Lewis Contention ."
2. Identify by author, title, date of publication, and publisher all books, documents, or papers that you intend to at this time to employ or rely upon in conducting your cross-examination of prospective NRC witnesses testifying in connection with the "Lewis Contention."
3. If the representations made in the "Lewis Contention" are based in whole or in part on any documents prepared by the NRC Staff or the licensee which you contend are deficient, specify which documents (and the particular portions) you regard as deficient and explain why they are deficient.

SPECIFIC INTERROGATORIES

On pages C4-6 through C4-9, the Staff discusses the gaseous radwaste system at TMI-1. On pages C5-1 through C5-6, the Staff discusses the capability of this system to keep the levels of radioactivity in effluents to levels as low as reasonably achievable. After reviewing these analyses, please answer the following questions:

1. Do you still believe additional filters beyond those now installed or proposed to be installed are needed on TMI-1 auxiliary building in order to adequately protect the health and safety of the public? If so, explain in detail the reasons for your belief and identify the documents which support your position.

2. Do you still believe preheaters are needed on the filters in the TMI-1 auxiliary building in order to adequately protect the health and safety of the public? If so, explain in detail your reasons for this belief and identify the documents which support your position.
3. Do you still believe preheaters on the filters in the TMI-1 auxiliary building are necessary to mitigate a TMI-2 type accident at TMI-1? If so, explain in detail your reasons for this belief and identify the documents which support your position.
4. Do you believe that the Staff's evaluation of the licensee's compliance with Order Items 4 and 5 is inadequate in any way? If so, describe in detail each of those inadequacies and identify the documents which support your position.