

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
THREE MILE ISLAND ALERT, INC.

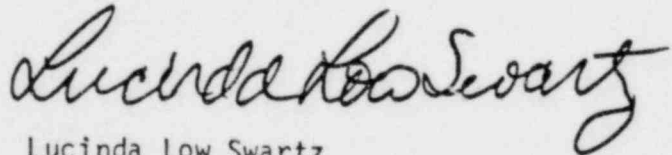
Pursuant to 10 C.F.R. § 2.70(b), the following interrogatories are directed to Three Mile Island Alert, Inc. Each interrogatory is to be answered separately and fully in writing under oath or affirmation by individuals having personal knowledge of the answers. The Licensing Board in this proceeding has 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.

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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.

TMIA

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:
 - a. Contention 5
 - b. Contention 6
 - c. Contention 7
2. Identify by author, title, date of publication, and publisher all books, documents, or papers that you intend at this time to employ or rely upon in conducting your cross-examination of prospective NRC witnesses testifying in connection with:
 - a. Contention 5
 - b. Contention 6
 - c. Contention 7
3. If the representations made in:
 - a. Contention 5
 - b. Contention 6
 - c. Contention 7are 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

Contention 5

On pages C6-1 through C6-24, the Staff discusses the licensee's compliance with Order Item 6. After reviewing this evaluation, please answer the following questions:

5-1 Do you believe that the revised facility procedures as described in the Restart Report and analyzed in the SER (see pages C6-15 and C6-16) are adequate to insure that necessary maintenance and repairs are performed at TMI-1?

If the answer above is "no," what procedures would you want implemented to see that proper maintenance is performed? Please identify the documents which support your position.

5-2 Specify the "violations" of NRC regulations referred to in Contention 5 that you intend to rely on in support of your contention in this proceeding and which are not adequately addressed in the SER. In so specifying, identify the NRC regulation for each instance that you contend was violated, and the source of your information that "violations" occurred.

- 5-3 Is it your position that regardless of the new facility procedures (see pages C6-15 and C6-16), licensee will be unable to properly maintain TMI-1 and to operate that unit safely? If so, explain in detail the basis for your position and identify the documents which support your position.
- 5-4 Do you believe that the Staff's evaluation of the licensee's compliance with Order Item 6 is inadequate in any way? If so, describe in detail each of those inadequacies and identify the documents which support your position.

Contention 6

On pages C7-1 through C7-19, the Staff discusses the licensee's compliance with Order Item 7 concerning financial qualifications. After reviewing this evaluation please answer the following questions:

- 6-1 Specify the technical changes referred to in your Contention 6, part 1, which are not accounted for in Chapter C7 of the SER and which you intend to rely upon in support of your contention. Specify the total cost of these changes that you assume in arriving at your conclusion that Metropolitan Edison Company does not possess the requisite financial qualifications, and identify the source for each assumed change.
- 6-2 Specify the "mandated design changes" referred to in part 2 of your contention 6 which are not accounted for in Chapter C7 of the SER and which you intend to rely on in support of your contention, to the extent that they are not already encompassed by part 1 of contention 6. Specify the total cost of these design changes that you assume in arriving at your conclusion that Metropolitan Edison Company does not possess the requisite financial qualifications, and identify the source of your assumed design cost for each change.
- 6-3 Specify the cost to Metropolitan Edison Company that you assume for changes in the financial protection requirements of 10 CFR Part 140 which are not accounted for in Chapter C7 of the SER that you refer to in part 2 of your contention 6. Identify the exact source of the cost that you specify in response to the first part of this interrogatory.

Contention 7

On pages C4-1 through C4-11, the Staff discusses the separation of TMI-1 operations from those at TMI-2. After reviewing this evaluation, please answer the following questions:

- 7-1 Do you still believe that the decontamination efforts at TMI-2 will affect the safe operation of TMI-1? If so, explain in detail the basis for your belief and identify the documents which support your position.

- 7-2 Do you still believe that possible problems with the decontamination of TMI-2 may require the emergency use of TMI-1 facilities such that TMI-1 cannot be operated safely? If so, explain in detail the basis for your belief and identify the documents which support your position.
- 7-3 If the answer to 7-2 is "yes," describe all possible scenarios at TMI-2 which you believe would require the emergency use of TMI-1 facilities.
- 7-4 Do you still believe there is inadequate storage water capacity at TMI in the event of an accident at TMI-1? If so, explain in detail the basis for your belief and identify the documents which support your position.
- 7-5 If the answer to 7-4 is "yes," describe all possible accident scenarios at TMI-1 for which you believe there would be inadequate storage water capacity.
- 7-6 Do you believe that the Staff's evaluation of the licensee's compliance with Order Item 4 is inadequate in any way? If so, describe in detail each of those inadequacies and identify the documents which support your position.