

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
ANTI-NUCLEAR GROUP REPRESENTING YORK

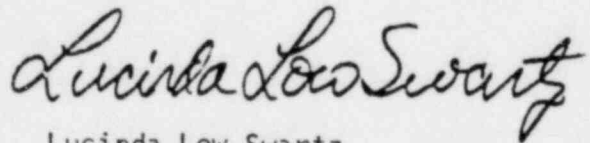
Pursuant to 10 C.F.R. § 2.740b, the following interrogatories are directed to Anti-Nuclear Group Representing York. Each interrogatory is to be answered separately and fully in writing under oath or affirmation by individuals having personal knowledge of the answers. The Licensing Board in this proceeding 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.

ANGRY

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 2
 - b. Contention 3
 - c. Contention 4
 - d. Contention 5 (A-D)
 - e. UCS Contention 13

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 2
 - b. Contention 3
 - c. Contention 4
 - d. Contention 5 (A-D)
 - e. UCS Contention 13

3. If the representations made in:
 - a. Contention 2
 - b. Contention 3
 - c. Contention 4
 - d. Contention 5 (A-D)
 - e. Contention 13

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 C3-1 through C3-5 of the SER, the Staff evaluates the licensee's emergency plan. After reviewing this evaluation, please answer the following questions:

Contention 2

- 2-1 Do you still believe that the Commonwealth of Pennsylvania emergency plan or plans submitted by various localities will not be reviewed against NRC standards as contained in NUREG-75/111? If so, explain in detail the basis for your belief and identify the documents which support your position (refer to page C3-2).
- 2-2 Do you still believe that the test exercise of licensee's emergency plan will not be coordinated with State and local agencies? If so, explain in detail the basis for your belief and identify the documents which support your position. (Refer to page C3-4).
- 2-3 Do you still believe that the offsite monitoring capability as described in the emergency plan and evaluated in the SER is insufficient? If so, explain in detail the basis for your belief and identify the documents which support your position.
- 2-4 Do you believe that the Staff's evaluation of licensee's emergency plan is deficient in any way? If so, describe in detail each of those deficiencies and identify the documents which support your position.

Contention 3

3-1 Do you still believe that all aspects of the emergency plan will not be implemented within 60 days prior to restart of TMI? If so, explain in detail the reasons for your belief and identify the documents which support your position (refer to page C3-4).

Contention 4

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

- 4-1 Do you still believe that licensee lacks the management capability to operate TMI-1 without endangering 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.
- 4-2 Do you believe that the changes made by the licensee in its management structure, facility procedures, operator training, quality assurance program as described in the Restart Report and evaluated in the SER will improve the licensee's ability to competently manage the operation of TMI-1?
- 4-3 What specific measures do you believe licensee should take in order to ensure that it is competent to manage TMI-1?
- 4-4 Do you believe that regardless of the measures licensee takes to improve its management competence, licensee will be unable to manage and operate TMI-1 in a competent manner? If so, explain in detail the reasons for your belief and identify the documents which support your position.

4-5 Do you believe that the Staff's evaluation of 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 5

On pages C4-1 through C4-9 the Staff discusses the liquid and gaseous radioactive waste systems at TMI-1. After reading this evaluation, please answer the following questions:

5-1 Do you believe that the liquid and gaseous radioactive waste systems at TMI-1 as described in the Restart Report and evaluated in the SER are adequate to ensure that TMI-1 can be operated safely? If not, explain in detail the reasons for your belief and identify the documents which support your position.

5-2 Do you believe that the Staff's evaluation of 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.