

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

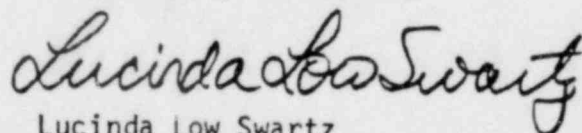
SECOND SET OF NRC STAFF INTERROGATORIES OF
NEWBERRY TOWNSHIP

Pursuant to 10 C.F.R. § 2.740b, the following interrogatories are directed to Newberry Township. 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.

NEWBERRY TWP

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 Contention 3.
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 Contention 3.
3. If the representations made in Contention 3 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

Contention 3

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

- 3-1 Do you still believe that the licensee's emergency plan is deficient because there is no written agreement between licensee and firefighters or police officers for protection during an emergency? If so, explain in detail the basis for your belief and identify the documents which support your position. (Refer to page C3-3).
- 3-2 Do you still believe that licensee's emergency plan is inconsistent with the emergency plans established by the state and local governments? (Refer to page C3-2.) If so, explain in detail the basis for your belief and identify the documents which support your position.

- 3-3 What is the basis for your assertion that "most local municipalities are not aware of their responsibility to develop a separate emergency plan...."? Please identify the documents which support your position. (Refer to page C3-2.)
- 3-4 Do you believe that the Staff's evaluation of the licensee's emergency plan is inadequate in any way? If so, describe in detail each of those inadequacies and identify the documents which support your position.