MIL 7/16/80.

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD.

DOCKETED
USNRC
JUL 1 8 1980
Office of the Secretary
Docketing & Service
Branch

In the matter of

METROPOLITAN EDISON CO.TMI#1 } Docket No 50-289

ANSWER TO SECOND SET OF INTERROGATORIES OF MARVIN I. LEWIS.

General interrogatories:

1. Ms Swartz's letter of 7 July says to limit my response to this interrogatory to the SER only. At this point , I plan to use only those parts of th SER which are referred to ~~no~~ in my , Licensee's, or Staff's Interrogatories about the SER.

2. Same answer as #1 except I won't really have an X examination plan developed until the date required by the Board.

3. My interrogatories sent out 6-30-80 do exactly what is asked for in this Interrogatory . There are aldo parts in the Restart Report which may be deficient , but I am still researching that question. It will all be submitted in a timely manner.

Specific Interrogatories:

1. I am not sure after being in this proceedure whether any number of filters can do the job of protecting the health and safety of the public in an adequate manner. The reasons are that I have not seen the Staff ~~of~~ or licensee attack this problem in any manner . There fore , there cannot be any documentation except an absence of documentation to which I referred in my Interrogatories on th e SER.

2. Preheaters may not solve some basic problems in the filter system. These were referred to in my submittal on the SER 6-30-80. Again , I have to admit that a fully developed answer to this Interrogatory must await responsive and complete answers to my SER Interrogatories. I know that this sounds like I am throwing the ball back in you court , but I really was hoping for a more definitive SER which would allowed me toanswer these questions appropriately and fully.

3. I am not sure because ~~that~~ the SER and the REstart Report have not given me enough information to come to the conclusion that preheaters are unnecessary. I really think that preheaters should not be needed if the design is adequate, but nothing in the Restart Report nor theSER suggests that the design is adequate.

4. Which Order Items 4 and 5? Are you referring to August 9? Please give Citation.

Marvin I. Lewis.

8007310143

DS03
S
1/1

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 Nuclear Station, Unit No. 1)	Docket No. 50-289 (Restart)

CERTIFICATE OF SERVICE

I hereby certify that a copy of [redacted] Lewis 3/16/80 was put in mail to

* Secretary of the Commission
ATTN: Chief, Docketing and Service Section
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Ivan W. Smith, Esquire
* Atomic Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Walter H. Jordan
881 W. Outer Drive
Oak Ridge, Tennessee 37830

Dr. Linda W. Little
5000 Hermitage Drive
Raleiegh, North Carolina 27612

George F. Trowbridge, Esquire
* Shaw, Pittman, Potts & Trowbridge
1800 "M" Street, N.W.
Washington, D.C. 20006

* James Tourtellotte, Esquire
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Marvin I. Lewis 3/16/80

[redacted]

[redacted]