



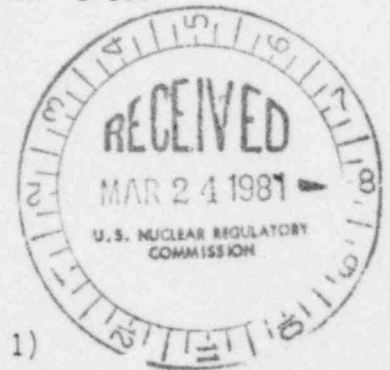
UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

March 23, 1981

Ivan W. Smith, Esq., Chairman  
Administrative Judge  
Atomic Safety and Licensing Board  
25 North Court Street  
Harrisburg, PA 17105

Dr. Linda W. Little  
Administrative Judge  
Atomic Safety and  
Licensing Board  
25 North Court Street  
Harrisburg, PA 17105

Dr. Walter H. Jordan  
Administrative Judge  
Atomic Safety and Licensing Board  
25 North Court Street  
Harrisburg, PA 17105



In the Matter of  
Metropolitan Edison Company, et al.  
(Three Mile Island Nuclear Station, Unit 1)  
Docket No. 50-289  
(Restart)

Dear Administrative Judges:

By an oral ruling of the Licensing Board at the hearing session on March 4, 1981 (Tr. 14036), March 16, 1981 was set as the date for the filing of written testimony on offsite emergency planning matters. Pursuant to this ruling, the NRC Staff filed, on March 16, 1981, "Testimony of FEMA's Vernon E. Adler and Frederick J. Bath on Contentions Related to Offsite Emergency Preparedness" and "Joint Testimony of NRC Staff's Stephen Chesnut and FEMA's Frederick J. Bath on Contentions Related to Onsite/ Offsite Emergency Preparedness". This testimony, in combination with the "Testimony of Frederick J. Bath and Vernon E. Adler of the Federal Emergency Management Agency on Certain Offsite Emergency Planning Contentions", previously filed on February 23, 1981, was intended to address all admitted contentions related to offsite emergency preparedness (over 85 contentions).

Upon a review of the written testimony that was filed, it has become clear that two admitted contentions related to offsite emergency planning, EP-14J (Newberry Contention York Plan 10) and EP-11 (ECNP Contention 2-33) were omitted from the written testimony filed by the Staff and were not addressed directly in that written testimony. The substance of EP-14J is addressed, in part, by the written testimony filed by the Staff. Absent objection, the Staff would propose to have the FEMA witnesses address EP-14J directly through limited supplemental oral testimony at the time

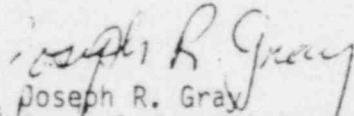
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the FEMA witnesses testify in support of their previously filed written testimony.

As to EP-11, the subject matter of this contention is such that it cannot be addressed by the FEMA witnesses and has not been addressed, in whole or in part, by the written testimony on offsite emergency planning filed by the Staff to date. Accordingly, separate written testimony, attached to this letter, has been prepared by the Staff. In view of the fact that hearing sessions on offsite emergency planning will not commence until April 4, 1981, acceptance of the attached testimony for filing now should allow ample time for the parties to review the testimony prior to hearing and to prepare their cross-examination on it and should not result in prejudice to the parties. Moreover, the Staff believes that the attached testimony will contribute to the development of a more complete record on the issues raised in EP-11. Accordingly, the Staff submits the attached testimony and asks that it be accepted for filing at this time.

Sincerely,

  
Joseph R. Gray  
Counsel for NRC Staff

Enclosure: As Stated

cc w/enclosure: Service List