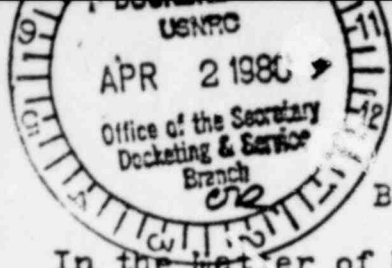


March 20, 1980



United States of America
Nuclear Regulatory Commission

Before the Atomic Safety and Licensing Board

In the matter of Metropolitan Edison Company, Three Mile Island Unit 1
Docket 50-289 (Restart)

AAMODT RESPONSE TO LICENSEE'S OBJECTIONS TO THE THIRD (SIC; SIXTH) SET
OF INTERROGATORIES DATED February 25, 1980

Intervenor is at a total loss to comprehend any logic which could have been operative in Licensee's decision to present the subject objections. We assert that each interrogatory bears an appropriate relationship to Contention 4 and is within the scope of the hearing for the following reasons:

a. Interrogatory 4 - NUREG 0396 provides the basis for requiring "sheltering" of population (as opposed to evacuation) and protection of foodstuffs beyond the 10 mile EPZ to a 50 mile perimeter. Timely dissemination of appropriate information is needed for both of these actions. In simple terms, one must know where potential contaminants are expected to be found before one can take protective action.

b. Interrogatory 5 - Same as (a).

c. Interrogatory 6 - Same as (a), adding the consideration that evacuation of the 10 mile EPZ complicates response and, therefore, must be considered.

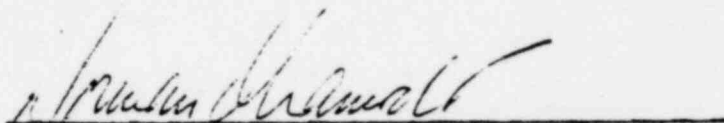
d. Interrogatory 7 - The August 9 Notice and Order of Hearing, page 6 section 3/d, requires adequate "fit" of several emergency plans "so as to assure the capability to take emergency action." The time needed to take appropriate action (within or without the 10 mile EPZ) is a function of Licensee's responses to Interrogatories 7 and 8. Further, subject matter raised in Interrogatories 7 and 8 relates to potential aberrations in evacuation procedures which could cause a total lack of assurance that emergency action could be effectively carried out.

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e. Interrogatory 9 - Preliminarily, the arguments for (d) apply. Further, it must be evident to Licensee, since Licensee has spent heavily in public relations, that the public will respond to a given situation in accordance with its learned perceptions. This interrogatory deals with the end result of information flow, (Will it be acted on?) a key element in providing assurance of the capability to take emergency action.

f. Interrogatory 10 - Licensee's objection is frivolous. Clearly this does not relate to additional manpower resources. Rather, the board allowed the revision to Contention 4 which dealt with data transmission from "plant operating personnel..immediately... to the NRC..." Simply stated, this interrogatory deals with the question, "Who will be available to do what?", with this added burden placed on Licensee.

Respectfully submitted,



Norman O. Aamodt