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 Nuclear Station, Unit 1, Docket 50-289

AAMODT RESPONSE TO LICENSEE'S OBJECTIONS TO THE SECOND SET OF INTERROGATORI

Contrary to Licensee's objections, the subject interrogatories do relate to Aamodt Contention 8. As Licensee correctly notes, Contention 8 is limited to short term Recommendation 5 which states, "the Licensee shall demonstrate that the waste management capability including* storage and processing for solid, liquid and gaseous wastes is adequate to assure safe operation..." Before there can be assurance that capability is adequate, quantities to be handled must be reliably defined. Intervenor challenges Licensee's assessment of quantities of radioactive materials, released both routinely and accidentally under "normal" operating conditions and, therefore, challenges capability under projected waste management mechanisms.

Regarding Licensee's interrogatories 8-3 and 8-4 as discussed in subject objections, Intervenor holds as above that one must know how much is required to be stored and/or processed before one can be assured that the capability exists to assure safe operation. Simply stated, one must know how much garbage will be generated before one buys garbage cans.

For the above reasons Intervenor holds that

1. Licensee should respond to subject interrogatories,

2. Intervenor cannot respond to Licensee interrogatories 8-3 and 8-4 lacking requested information.

*clearly inferring "not limited to"

Respectfully submitted,

Norman O. Aamodt