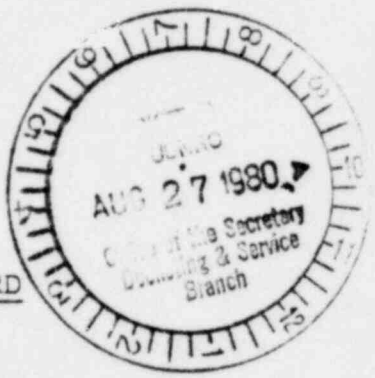
LIC 8/25/80



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY	)	Docket No. 50-289
	)	(Restart)
(Three Mile Island Nuclear Station, Unit No. 1)	)	

LICENSEE'S RESPONSE TO PETITION TO INTERVENE BY VICTAULIC COMPANY ET AL.

On August 13, 1980, Victaulic Company and other industrial customers of Licensee (Petitioners) filed a late petition to intervene in this proceeding in support of the restart of TMI-1. Licensee reluctantly opposes the petition because of the potential for delay in the proceeding. Licensee is confident that Petitioners would make every effort to avoid delay. However, assuming as we do that the Board would extend to existing parties procedural rights equivalent to those already afforded in the proceeding, there is a substantial risk that the process of formulating contentions, argument over the allowability, specificity and bases of contentions, conduct of discovery and resolution of discovery disputes would result in hearing delays.

8008280669

D503
S 0/1

Licensee urges that Petitioners be afforded ample opportunity to make limited appearances.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By George F. Trowbridge
George F. Trowbridge

Dated: August 25, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY	)	Docket No. 50-289
	)	(Restart)
(Three Mile Island Nuclear Station, Unit No. 1)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Response to Petition to Intervene by Victaulic Company et al.," dated August 25, 1980, were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 25th day of August, 1980.

George F. Trowbridge

Dated: August 25, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY	)	Docket No. 50-289
	)	(Restart)
(Three Mile Island Nuclear Station, Unit No. 1)	)	
	)	

SERVICE LIST

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

Dr. Walter H. Jordan
Atomic Safety and Licensing
Board Panel
881 West Outer Drive
Oak Ridge, Tennessee 37830

Dr. Linda W. Little
Atomic Safety and Licensing
Board Panel
5000 Hermitage Drive
Raleigh, North Carolina 27612

James R. Tourtellotte, Esquire (4)
Office of the Executive Legal Director
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section (3)
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

John A. Levin, Esquire
Assistant Counsel
Pennsylvania Public Utility Comm'
Post Office Box 3265
Harrisburg, Pennsylvania 17120

Karin W. Carter, Esquire
Assistant Attorney General
505 Executive House
Post Office Box 2357
Harrisburg, Pennsylvania 17120

John E. Minnich
Chairman, Dauphin County Board
of Commissioners
Dauphin County Courthouse
Front and Market Streets
Harrisburg, Pennsylvania 17101

Walter W. Cohen, Esquire
Consumer Advocate
Office of Consumer Advocate
14th Floor, Strawberry Square
Harrisburg, Pennsylvania 17127

Jordan D. Cunningham, Esquire
Attorney for Newberry Township
T.M.I. Steering Committee
2320 North Second Street
Harrisburg, Pennsylvania 17110

Theodore A. Adler, Esquire
Widoff Reager Selkowitz & Adler
Post Office Box 1547
Harrisburg, Pennsylvania 17105

Ellyn R. Weiss, Esquire
Attorney for the Union of Concerned Scientists
Harmon & Weiss
1725 Eye Street, N.W.
Washington, D.C. 20006

Steven C. Sholly
304 South Market Street
Mechanicsburg, Pennsylvania 17055

Gail Bradford
Holly S. Keck
Legislation Chairman
Anti-Nuclear Group Representing York
245 West Philadelphia Street
York, Pennsylvania 17404

Robert E. Kelly, Jr., Esquire
Duane, Morris & Heckscher
P. O. Box 1003
203 Pine Street, Suite 401
Harrisburg, Pennsylvania 17108

Roland Morris, Esquire
Duane, Morris & Heckscher
100 South Broad Street
Philadelphia, Pennsylvania 19110

William S. Jordan, III, Esq.
Attorney for People Against Nuclear Energy
Harmon & Weiss
1725 Eye Street, N.W.
Washington, D.C. 20006

Robert Q. Pollard
609 Montpelier Street
Baltimore, Maryland 21218

Chauncey Kepford
Judith H. Johnsrud
Environmental Coalition on Nuclear Power
433 Orlando Avenue
State College, Pennsylvania 16801

Marvin I. Lewis
6504 Bradford Terrace
Philadelphia, Pennsylvania 19149

Marjorie M. Aamodt
R. D. 5
Coatesville, Pennsylvania 19320

Donald A. Tortorice, Esquire
Duane, Morris & Heckscher
P. O. Box 1003
203 Pine Street, Suite 401
Harrisburg, Pennsylvania 17108