

SHAW, PITTMAN, POTTS & TROWBRIDGE

1800 M STREET, N. W.
WASHINGTON, D. C. 20036

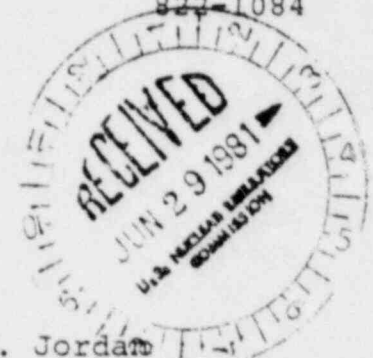
RAMSAY D. POTTS
STUART L. PITTMAN
GEORGE F. TROWBRIDGE
STEPHEN O. POTTS
GERALD CHARNOFF
PHILLIP O. BOSTWICK
R. TIMOTHY HANLON
GEORGE M. ROGERS, JR.
FRED A. LITTLE
JOHN B. RHINELANDER
BRUCE W. CHURCHILL
LESLIE A. NICHOLSON, JR.
MARTIN D. KRALL
RICHARD J. KENDALL
JAY E. SILBERG
BARBARA M. ROSSOTTI
GEORGE V. ALLEN, JR.
WM. BRADFORD REYNOLDS
FRED DRASNER
R. KENLY WEBSTER
NATHANIEL P. BREED, JR.
MARK AUGENBLICK
ERNEST L. BLAKE, JR.
CARLETON S. JONES
THOMAS Z. BAXTER
JAMES M. BURGER
SHELDON J. WEISEL
JOHN A. McCULLOUGH
J. PATRICK HICKEY
GEORGE P. MICHAELY, JR.
JAMES THOMAS LENHART
STEVEN L. MELTZER
DEAN D. AULICK
JOHN ENGEL
STEPHEN S. HUTTNER
WINTROP N. BROWN
JAMES B. HAMLIN
ROBERT E. ZAHLER
RICHARD E. GALEN
ROBERT B. ROBBINS

STEVEN M. LUCAS
MATIAS F. TRAVIESO-DIAZ
VICTORIA J. PERKINS
JOHN H. O'NEILL, JR.
JAY A. EPSTEN
RAND L. ALLEN
TIMOTHY B. McBRIDE
ELISABETH M. PENDELTON
LUCY G. ELIASOF
PAUL A. KAPLAN
HARRY H. GLASSPIEGEL
RANDAL B. KELL
THOMAS H. McCORMICK
SUSAN D. FALKSON
WILLIAM R. BARR
SUSAN M. FREUND
JOHN L. CARR, JR.
PHILIP J. HARVEY
ROBERT M. GORDON
BARBARA J. MORSE
BONNIE S. GOTTLIEB
ALFRED M. POSTELL
HOWARD H. SHAFFERMAN
DEBORAH S. BAUSER
SCOTT A. ANENBERG
SETH H. HOOGLASIAN
SHEILA E. McCAFFERTY
DELISSA A. RIDGWAY
KENNETH J. HAUTMAN
DAVID LAWRENCE MILLER
ANNE M. KRAUSKOPF
FREDERICK L. KLEIN
GORDON R. KANOFFSKY
SALLY C. ANDREWS
JEFFREY S. GIANCOLA
HANNAH E. M. LIEBERMAN
SANDRA E. FOLSON
MARCIA R. NIRENSTEIN
JUDITH A. SANDLER

(202) 822-1000
TELECOPIER
(202) 822-1099 & 822-1199
TELEX
89-2693 SHAWLAW WSH
CABLE "SHAWLAW"
EDWARD S. CROSLAND
COUNSEL
WRITER'S DIRECT DIAL NUMBER
822-1084



June 22, 1981



Ivan W. Smith, Esquire
Chairman
Atomic Safety and Licensing Board
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

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

Dear Chairman Smith and Drs. Little and Jordan:

Enclosed is a Table of Contents to Licensee's Reply to
TMIA Findings on Management Issues, dated June 15, 1981.

Respectfully submitted,

Ernest L. Blake, Jr.
Ernest L. Blake, Jr.
Counsel for Licensee

DS03
5
1/1

Enclosure
cc: per Certificate of Service

8106300 350

G

TABLE OF CONTENTS TO
LICENSEE'S REPLY TO TMIA
FINDINGS ON MANAGEMENT
ISSUES, DATED JUNE 15, 1981

	<u>Page</u>
I. Introduction.....	1
II. Licensee's Reply to TMIA Findings.....	3
Safety Related Maintenance.....	3
Deferral of Maintenance and Poor Record-Keeping.....	6
Estimated Manhours.....	13
Overtime.....	15
Budget Cut.....	20
Auditability of Maintenance Practices in the Sample Year, 1978.....	20
Licensee's New Corporate Structure.....	21
Conclusion.....	31

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 SP
)	(Restart)
(Three Mile Island Nuclear)	
Station, Unit No. 1))	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing letter to the Atomic Safety and Licensing Board with attached Table of Contents were served this 22nd day of June, 1981 by deposit in the U.S. mail, first class, postage prepaid, to the individuals identified on the attached Service List.

Ernest L. Blake, Jr.

Ernest L. Blake, Jr.

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

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

John A. Levin, Esquire
Assistant Counsel
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, Pennsylvania 17120

Karin W. Carter, Esquire
Robert Adler, Esquire
Assistant Attorney General
505 Executive House
P.O. 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
1425 Strawberry Square
Harrisburg, Pennsylvania 17127

Jordan D. Cunningham, Esquire
2320 North Second Street
Harrisburg, Pennsylvania 17110

Ms. Louise Bradford
TMI ALERT
315 Peffer Street
Harrisburg, Pennsylvania 17102

Ellyn R. Weiss, Esquire
Harmon & Weiss
1725 Eye Street, N.W., Suite 506
Washington, D.C. 20006

Steven C. Sholly
Union of Concerned Scientists
1725 Eye Street, N.W., Suite 601
Washington, D.C. 20006

Gail Bradford
ANGRY
245 West Philadelphia Street
York, Pennsylvania 17404

William S. Jordan, III, Esquire
Harmon & Weiss
1725 Eye Street, N.W., Suite 506
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

Thomas J. Germine, Esquire
Deputy Attorney General
Division of Law - Room 316
1100 Raymond Boulevard
Newark, New Jersey 07102