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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Appeal Board

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

LICENSEE'S MOTION FOR A STAY OF LICENSING BOARD'S ORDER ON CONFIDENTIALITY

Licensee hereby moves pursuant to 10 C.F.R. § 2.788 for a stay of the Licensing Board's "Memorandum and Order Affirming Special Master's Order on Confidentiality," dated November 6, 1981, pending disposition of Licensee's appeal from that Order.

As grounds for this motion, Licensee states as follows:

1. For the reasons stated in the brief filed with this motion, Licensee is likely to succeed on the merits of its appeal. Licensee respectfully requests the Appeal Board to refer to its brief for a statement of the reasons why the Licensing Board's November 6 Order should be reversed.

2. The Licensing Board's Order involves the issue of whether the identities of certain of Licensee's employees should remain confidential during the reopened hearing on restart of Three Mile Island Nuclear Station, Unit No. 1 ("TMI-1"). If the

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employees' identities are disclosed pursuant to the Licensing Board's Order, the present confidentiality will be lost forever, and the employees will be subjected to irreparable injury in the form of personal embarrassment, humiliation, and possible exposure to physical harm. An immediate stay is necessary because the reopened hearing commences on November 10, 1981, and the Licensing Board's stay of its November 6 Order expires by its terms at "the close of business, November 10, 1981."

3. The stay requested here would preserve the status quo and will not result in any harm to the other parties.

4. The public interest favors issuance of a stay to protect Licensee's employees from an unnecessary and unwarranted invasion of personal privacy and to vindicate the policies expressed in the Privacy Act, 5 U.S.C. § 552a.

This motion is based upon Licensee's Notice of Appeal and supporting Memorandum filed herewith and upon all the pleadings previously filed in this matter.

DATED: November 10, 1981.

Respectfully submitted,

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