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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY
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Before the Commission

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

LICENSEE'S REPLY TO
UCS MOTION FOR RECONSIDERATION

On January 21, 1982, UCS filed a Motion for reconsideration of the Commission's Order of January 11, 1982, extending until January 28, 1982, the time for comments on immediate effectiveness of the Licensing Board's partial initial decision of December 14, 1981. The UCS motion for reconsideration, which was filed only one week before the due date for comments, repeats UCS's earlier request that the comment period be extended to February 15, 1982. Contrary to the UCS certificate of service which accompanied its motion for reconsideration, the motion was not hand-delivered to Licensee's counsel but was placed in the ordinary U.S. mail on January 21.

UCS's original request for extension was based on UCS's other involvements during the comment period in the TMI-1 proceeding. These involvements have already been considered by the Commission in rescheduling comments from January 13 to January 28, 1982. The

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only new involvement asserted by UCS is the Commission's invitation to parties on January 15, 1982, to comment on certain additional materials presented by the Staff and ACRS to the Commission at a January 8, 1982, briefing session on water level instrumentation.

In its earlier request, UCS also argued as a basis for extension of the comment period an earlier opportunity afforded by the Commission to comment on another set of papers provided to the Commission by the Staff on the water level instrumentation issue. At that time Licensee pointed out that UCS had abandoned its contention on this issue before the Licensing Board, did not participate in any of the testimony or argument on the issue before the Licensing Board, and filed no proposed findings on the issue. In these circumstances, any decision by UCS to reenter the fray could not justify extension of the comment period on immediate effectiveness.

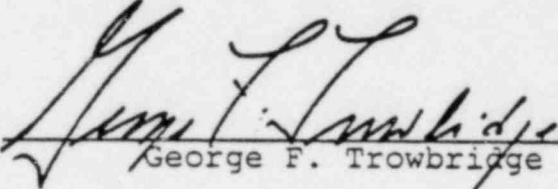
Further, considering the comments filed by UCS in response to the Commission's earlier invitation, the Commission should view with skepticism both the contribution which UCS is likely to make in a second round of comments on the water level issue and the time involved in making such comments. UCS's earlier comments, consisting of little more than a page, were buried in its filing with the Commission, dated January 13, 1982, entitled "UCS Comments on Staff Briefing of Commission and Renewal of Motion for Affidavits Concerning Ex Parte Contacts." Like the rest of the document, UCS's comments attacked the propriety of Commission meetings with the

Staff and contained no technical information or analysis.

Respectfully submitted,

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By:


George F. Trowbridge

Counsel for Licensee

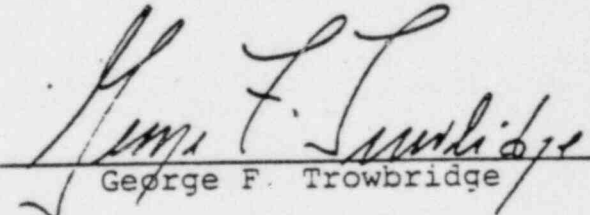
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing "Licensee's Reply to UCS Motion for Reconsideration" was served by hand delivery on those persons on the attached Service List with an asterisk (*) appearing before their names, and by deposit in the United States mail, postage prepaid, addressed to all other persons on the attached Service List, this 25th day of January, 1982.



George F. Trowbridge

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