

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
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BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

'82 AUG 26 P3:25

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)

METROPOLITAN EDISON COMPANY)

(Three Mile Island Nuclear)
Station, Unit 1))

Docket No. 50-289 SP
(Restart)

SUPPLEMENTAL MEMORANDUM OF O AND VV

In response to a telephonic request from counsel for the Appeal Board that O and VV clarify their intended involvement on appeal if permitted to intervene, O and VV, through their undersigned counsel, respectfully state that:

1. Neither O nor VV will file exceptions to the Partial Initial Decision of the Atomic Safety and Licensing Board served July 28, 1982.

2. O intends to file a responsive brief to the briefs, if any, that are filed in support of TMIA exceptions 23, 24, 109, 110 and Aamodt exception 133.

3. VV may wish to file a responsive brief to the briefs, if any, that are filed in support of TMIA exceptions 108-23 should those and Aamodt exceptions 183-87 argue for relief inimical to VV.

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4. Should the briefs filed herein not advocate relief inimical to O and VV, neither would file a brief or otherwise seek to participate herein. Both seek leave to intervene only because no party represents their interests herein, and no party has done so below. Because each was permitted to file comments with the Licensing Board on the Special Master's recommendations (although only O did so), neither O nor VV has previously sought leave to intervene.

5. The undersigned counsel have not been served with the exceptions of the Commonwealth of Pennsylvania. If those exceptions raise other issues as to which O and VV have an interest, they may wish to be heard on those issues.

Respectfully submitted,

LeBOEUF, LAMB, LEIBY & MacRAE

By Harry H. Vargo

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August 26, 1982

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that I have, this 26th day of August, 1982, served copies of the foregoing document entitled "Supplemental Memorandum of O and VV", by hand or by mailing copies thereof by first-class mail, postage prepaid and properly addressed to the following:

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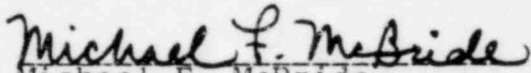
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