

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

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In the Matter of)
METROPOLITAN EDISON COMPANY)
(Three Mile Island Nuclear)
Generating Station, Unit 1)

Docket 50-289 SF
(Restart)

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AAMODT RESPONSE TO TMIA MOTIONS (9/1/82)
(TO EXTEND TIME AND PAGE LIMITS OF BRIEF)

We stated to TMIA's representative, Louise Bradford, in response to her telephone call last week, that we have no objection to an extension of the time to file briefs until September 30, 1982. Ms. Bradford plans to initiate a conference call among the parties on Tuesday afternoon. She stated that the only subject of this call would be the TMIA motion to extend the time to file briefs until September 30. We could see no reason to be included in this conference call.

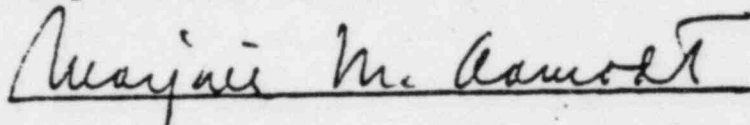
We take no position on TMIA's request for a waiver of the page limit. We make no such request for ourselves.

We received a call from the Appeal Board concerning a division of effort among the intervenors in order to retain the page limit and avoid repetitious arguments. We have studied TMIA Proposed Findings of Fact and Conclusions of Law on Issues Raised in Reopened TMI-1 Restart Proceeding, filed January 15, 1982. We note that TMIA took a different position than we did on the

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conduct of the proceeding, the extent of cheating, the conduct of the NRC investigation and Licensee's investigation, the involvement of management in cheating, and proposed no findings on the Ross issues the TMI training program, the NRC examination, or the attitudes of the operators. Although TMIA's later position, following Judge Milhollin's report, is closer to ours (Aamodt Findings, January 18, 20 and March 4, 1982), we have no assurance that TMIA's representative would represent our interests. We would, prefer, therefore, to accomodate the Appeal Board by briefing all our exceptions within the page limitation. If, however, the Appeal Board waivers the page limitation for TMIA, we believe the opportunity for an extension should be granted to all parties.

Respectfully submitted,



Marjorie M. Aamodt

September 6, 1982