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February 16, 1983

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

Administrative Judges Edles, Buck & Gotchy:

Pursuant to the Appeal Board's Order of January 18, 1983, please find enclosed Licensee's direct testimony in response to Issues 1 through 9 of the Appeal Board's Memorandum and Order of December 28, 1982 (ALAB-708). We have not responded to Issues 10 and 11, which are directed at the NRC Staff.

I should note that in the enclosed Licensee's Testimony of Robert C. Jones, Jr., in Response to ALAB-708 Issue Nos. 4 through 7 (ECCS Evaluations and Boiler-Condenser Cooling), the citations to "Licensee Ex. \_\_\_" refer to BAW-10154P, "B&W's Small-Break LOCA ECCS Evaluation Model" (November 1982), which I distributed on February 10, 1983.

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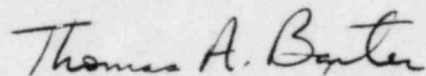
SHAW, PITTMAN, POTTS & TROWBRIDGE

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Gary J. Edles, Esquire  
Dr. John H. Buck  
Dr. Reginald L. Gotchy  
February 16, 1983  
Page Two

In addition, Licensee's testimony in response to Issue No. 9, on feed and bleed reliance, is accompanied by a clarifying memorandum from counsel which addresses the Appeal Board's interpretation of certain testimony on this subject presented before the Licensing Board.

Sincerely,



Thomas A. Baxter  
Counsel for Licensee

TAB:jah

Enclosures

cc: per Certificate of Service

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

CERTIFICATE OF SERVICE

I hereby certify that copies of:

Licensee's Testimony of Gary R. Capodanno in  
Response to ALAB-708 Issue No. 1 (Hot Leg  
High Point Vent Sizing);

Licensee's Testimony of Robert C. Jones, Jr.  
and Louis C. Lanese in Response to ALAB-708  
Issue No. 2 (Use of Hot Leg Vents in Promoting  
Natural Circulation);

Licensee's Testimony of Francis F. Manganaro  
in Response to ALAB-708 Issue No. 3 (Hot Leg  
Vent Installation Status);

Licensee's Testimony of Robert C. Jones, Jr.  
in Response to ALAB-708 Issue Nos. 4 Through  
7 (ECCS Evaluations and Boiler-Condenser  
Cooling);

Licensee's Testimony of Gary R. Capodanno and  
Richard J. Chisolm in Response to ALAB-708  
Issue No. 8 (Safety-Grade Status of Emergency  
Feedwater System);

Licensee's Testimony of Robert C. Jones., Jr.  
and Louis C. Lanese in Response to ALAB-708  
Issue No. 9 (Reliance on Feed and Bleed  
Cooling); and

Licensee's Memorandum of Law Regarding ALAB-708  
Issue No. 9 (Reliance on Feed and Bleed Cooling)

were served this 16th day of February, 1983, by hand delivery  
upon the parties identified by an asterisk and by deposit in

the U.S. mail, first class, postage prepaid, to the other parties on the attached Service List.

*Thomas A. Baxter*  
\_\_\_\_\_  
Thomas A. Baxter, P.C.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

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

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