

RELATED CORRESPONDENCE

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

1800 M STREET, N. W.

WASHINGTON, D. C. 20036

(202) 822-1000

TELECOPIER

(202) 822-1099 & 822-1199

RAPIFAX 100

(202) 822-1072

TELEX

89-2693 (SHAWLAW WSH)

CABLE "SHAWLAW"

JOHN F. DEALY*

B. SCOTT CUSTER, JR.

COUNSEL

June 11, 1984

DEBORAH B. BAUER
SCOTT A. ANENBERG
CAMPBELL KILLEFER
PAUL M. THOMAS
JOHN M. BRYSON, II
GEORGE F. ALBRIGHT, JR.*
DAVID J. CYNAMON
SETH H. HOOGASTAN
SHEILA MCC. HARVEY
DELISSA A. RIDGWAY
KENNETH J. HAUTMAN
DAVID LAWRENCE MILLER
FREDERICK L. KLEIN
STEVEN P. PITLER
RICHARD J. PARRINO
ELLEN A. FREDERICK
ROBERT C. BOEHM
MARIE N. DOLAND
THOMAS C. HILL
DIANE E. BURKLEY
L. DUANE CHEEK
HANNAH E. M. LIEBERMAN
JUDITH A. SANDLER
EDWARD D. YOUNG, III
ANDREW D. ELLIS
RICHARD A. SAMP
THOMAS E. CROCKER, JR.
VICKI R. HARDING
PETER J. FERRARA
HELEN TORELLI

MARTHA BOONE ROWAN*
KENNETH R. MILLER
WENDELIN A. WHITE
STANLEY M. BARG
LESLIE K. SMITH
VIRGINIA S. RUTLEDGE
KATHERINE P. CHEEK
TRAVIS T. BROWN, JR.
RICHARD H. KRONTHAL
STEPHEN B. HEIMANN
SANDRA E. BRUSCA
EILEEN L. BROWNELL
PAMELA H. ANDERSON
ALEXANDER D. TOMASZCZUK
JEFFREY J. A. GIBBS
LAURENCE W. COHEN
PHILIP D. PORTER
MICHAEL A. SWIGER
ELLEN SHERIFF
ANITA J. FINKELSTEIN
EILEEN M. GLEIMER
DAVID R. SAHR
C. BOWDOIN TRAIN
JEFFREY W. KAMPELMAN
KENNETH A. GALLO
KENNETH D. AUERBACH
ALAN D. WASSERMAN
DAVID K. RYAN
RICHARD K. A. BECKER
WILBERT WASHINGTON II

* NOT ADMITTED IN D.C.

WRITER'S DIRECT DIAL NUMBER

(202) 822-1051

Sheldon J. Wolfe
Administrative Judge
Chairman, Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. David L. Hetrick
Administrative Judge
Atomic Safety and Licensing Board
Professor of Nuclear Engineering
University of Arizona
Tucson, Arizona 85271

Dr. James C. Lamb, III
Administrative Judge
Atomic Safety and Licensing Board
313 Woodhaven Road
Chapel Hill, North Carolina 27514

In the Matter of
Metropolitan Edison Company, Et. Al.
(Three Mile Island Nuclear Station, Unit No. 1)
Docket No. 50-289-OLA and ASLBP 83-491-04-OLA
(Steam Generator Repair)

Dear Administrative Judges:

Licensee has conferred with the NRC Staff and Intervenor TMIA on the matters specified in paragraph 3, page 92, of the Licensing Board's June 1, 1984 Memorandum and Order (Rulings on Motions for Summary Disposition). Licensee's position on each of those matters is as follows.

8406130091 840611
PDR ADOCK 05000289
9 PDR

DS03

June 11, 1984

Page Two

Licensee does not believe the scheduling of a separate prehearing conference is necessary. Most of the stated purposes of a prehearing conference, 10 C.F.R. § 2.752 have already been accomplished at this late stage in this proceeding. The issues have been simplified, specified and clarified by the Board's Memorandum and Order. The setting of the hearing schedule is being accomplished by notification from the parties, or, if necessary, can be established by telephone conference call. Licensee knows of no other matters which would warrant a prehearing conference; should any such matters arise, they also could be dealt with by conference telephone call, or possibly when the hearing is convened. Inasmuch as this is an application for an amendment of a previously issued operating license, the Commission's regulations do not require that a prehearing conference be held. Licensee believes that the Staff and TMIA are in accord with this view.

Licensee concurs with the Staff and TMIA that the hearing convene on Monday, July 16, 1984.

Licensee will introduce evidence on the matters identified at pages 23 and 32 of the Memorandum and Order. Specific witnesses have not yet been identified. Witnesses will probably be selected from the following tentative list:

CONTENTION 1.a

Item 1.a (Reliability of leak rate measurements). David G. Slear, TMI-1 Manager of Engineering Projects, GPUN; Donald K. Croneberger, Director, Engineering Design, GPUN; and/or George L. Lehman, Consulting Engineer, GPUN.

Item 1.b (Frequency of eddy current testing). Richard F. Wilson, Vice President of Technical Functions, GPUN; David G. Slear; and/or F. Scott Giacobbe, Manager, Materials Engineering and Failure Analysis, GPUN.

Item 1.c (Power ascension limitations). Richard F. Wilson; David G. Slear; T. Gary Broughton, Director, Systems Engineering, GPUN; and/or Thomas M. Hawkins, Manager, TMI-1 Start-Up Tests.

Item 1.d (Long term corrosion tests). F. Scott Giacobbe; and/or Gary R. Capodanno, Fluid Systems Director, GPUN.

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

June 11, 1984

Page Three

Item 2 (Stresses in steam generator tubes). David G. Slear; Douglas E. Lee, Manager, Engineering Department, B&W; and/or George J. Vames, Manager, Mechanical Design and Structural Analysis Section, B&W.


Item 3 (Hardness tests). David G. Slear; F. Scott Giacobbe; and/or Douglas E. Lee.

Item 4 (Kinetic expansion process). David G. Slear; Branch D. Elam, Jr., Manager, Mechanical Components Section, Engineering and Design Department, GPUN; Douglas E. Lee; and/or David Pai, Vice President, Foster Wheeler Energy Applications.

CONTENTION 1.b David G. Slear; Douglas E. Lee; and/or George J. Vames.

Licensee will submit the direct testimony of its witnesses to the Board and the parties on or before June 29, 1984.

Sincerely,


Bruce W. Churchill

BWC:mmm

cc: Service List

UNITED STATES OF AMERICA
: NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
METROPOLITAN EDISON COMPANY, ET AL.) Docket No. 50-289-OLA
) ASLBP 83-491-04-OLA
(Three Mile Island Nuclear) (Steam Generator Repair)
Station, Unit No. 1))

SERVICE LIST

Sheldon J. Wolfe
Administrative Judge
Chairman, Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. David L. Hetrick
Administrative Judge
Atomic Safety and Licensing Board
Professor of Nuclear Engineering
University of Arizona
Tucson, Arizona 85271

Dr. James C. Lamb, III
Administrative Judge
Atomic Safety and Licensing Board
313 Woodhaven Road
Chapel Hill, North Carolina 27514

Richard J. Rawson, Esq.
Mary E. Wagner, Esq.
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Joanne Doroshow, Esq.
Louise Bradford
Three Mile Island Alert, Inc.
315 Peffer Street
Harrisburg, Pennsylvania 17102

Jane Lee
183 Valley Road
Etters, Pennsylvania 17319

Norman Aamodt
R. D. 5, Box 428
Coatesville, Pennsylvania 19320