

RELATED CORRESPONDENCE

August 15, 1984

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 AGO 16 P12:51

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

LICENSEE'S REQUEST FOR EXTENSION OF TIME

TO RESPOND TO TMIA'S FIRST SET OF INTERROGATORIES

On July 31, 1984, TMIA served on Licensee by mail its First Request for Production and a related First Set of Interrogatories. Under the NRC Rules of Practice Licensee's response to the document request would normally be due on September 4, 1984, and licensee's response to the interrogatories would be due August 20, 1984. Licensee requests that the time for response to TMIA's First Set of Interrogatories be extended to the same date as the related TMIA document request, namely September 4, 1984.

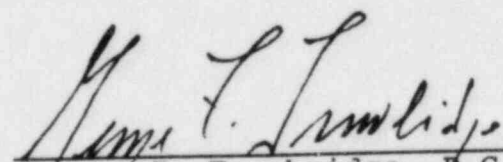
By separate motion Licensee has today filed with the Board a motion for protective order limiting the scope of TMIA's discovery requests. Even assuming Licensee's motion is granted, however, Licensee is still confronted with a massive set of interrogatories which simply cannot be answered in the normal time for interrogatory responses. This is largely because many of the interrogatories call for new or updated information which is sought from present and past GPU and B&W personnel. TMIA is not satisfied with information presently available to Licensee's management or contained in the multiple official accident reports and investigations.

It has taken Licensee some two weeks just to compile a list, not yet complete, of the individuals to whom questionnaires seeking information must be sent. Because Licensee has no complete list of all persons in the TMI control rooms on March 28-30, 1984, the list includes all persons who were at the TMI site on those days and already totals over 400 persons. That is not to say that all of these individuals, or even a large number of them, will have information pertinent to the interrogatories. The questionnaire is necessary in part to find out which individuals do have such information. It has also taken Licensee about two weeks to digest the interrogatories and to prepare a questionnaire responsive to the information sought.

TMIA's counsel has advised Licensee's counsel that TMIA would not object to an extension of time until August 27, 1984. Licensee will, however, be hard put to prepare and send out the questionnaire, receive replies, correlate the information obtained and prepare responses to the interrogatories even by September 4.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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Dated: August 15, 1984

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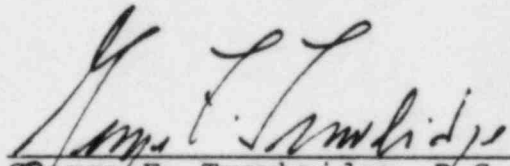
'84 AGO 16 P12:50

In the Matter of)
METROPOLITAN EDISON COMPANY)
(Three Mile Island Nuclear)
Station, Unit No. 1))

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
Docket No. 50-289 SP
(Restart Remand on Management)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Motion for Protective Order" and "Licensee's Request for Extension of Time to Respond to TMIA's First Set of Interrogatories", dated August 15, 1984 were served on those persons on the attached Service List by deposit in the United States mail, postage prepaid, or where indicated by an asterisk (*) by hand delivery, this 15th day of August, 1984.


George F. Trowbridge, P.C.

DATED: August 15, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

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