August 21, 1984

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

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

UCS NOTIFICATION OF INTENT TO ATTEND TMI-1 SITE VISIT AND
OBJECTION TO GPU ORIENTATION."

UCS has received Commissioner Zech's memorandum of August
14, 1984, notifying the parties of his plans to visit TMI-1 on
Thursday and Friday, August 30 and 31, 1984 for a site visit and
"an orientation to the GPU organization." UCS will attend, as
represented by Robert D. Pollard, and has no objection to the
site visit per se.

We do, however, object to the plan to provide the
Commissioner with an "orientation" by GPU to its organization.
While such an orientation might be considered neutral and
unobjectionable in the normal case, the composition, competence
and integrity of the GPU organization, and the extent to which it
is in actuality a "new organization" in terms of both personnel
and attitudes, is currently the central issue before the
Commission in the restart proceeding. In this circumstance, it
is fundamentally unfair and a violation of due process tenets for
the decision-maker to receive a one-sided presentation from one
of the adversary parties.

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Nor is it sufficient to permit the other parties to respond in writing after the fact. For one thing, this deprives the parties of the opportunity to question the GPU "presenters" concerning the factual basis for their assertions. As just a few examples, how many of the current GPU personnel were associated with GPU Service Corporation? How many of the current TMI-1 personnel were associated with GPU Service Corporation? What are their names and prior and current positions?

In essen_e, GPU can select and present the facts and faces most favorable to itself and the other parties have no meaningful opportunity to elicit other facts, to show bias, to confront the presenter with conflicting facts or to ca l other GPU personnel.
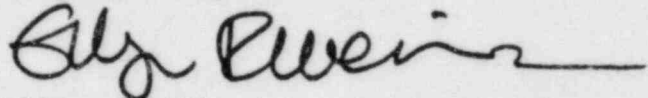
In addition, the opportunity to repond in writing is not the equivalent of an opportunity to speak directly to the decision-maker. Written responses come later, after opinions may be formed, and are unfortunately often not read by the Commissioners themselves but are instead assigned to staff for review and synopsis.

Finally, there is no need for the Commissioner to receive a briefing by GPU on its organization. Just a week ago, August 15, 1984, all parties were given ample opportunity to address the Commission orally on these issues. GPU's Board Chairman and the GPUN President spoke to the Commission for well over an hour and answered many questions. The composition and character of the GPU organization were the main topics of discussion. At that time, GPU submitted extensive written material as it has repeatedly in the past, directed precisely to GPU's view of "an

orientation to the GPU organization." There is thus manifestly
no reason to allow GPU yet a further opportunity to put its views
forward, particularly when the context is so unfair to the other
parties.

Therefore, UCS objects to the scheduled "orientation" by
GPU and urges Commissioner Zech to forego it.

Respectfully submitted,

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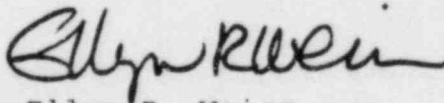 Unit No. 1)   )

CERTIFICATE OF SERVICE

I hereby certify that copies of UCS NOTIFICATION OF INTENT

TO ATTEND TMI-1 SITE VISIT AND OBJECTION TO GPU ORIENTATION were

served this 21st day of August, 1984, by depositing them in the

U.S. mail, first class postage prepaid, to the parties on the

attached service list.

Ellyn R. Weiss