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TMIA - 9/18/84

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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'84 SEP 19 12:04

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY	)	Docket No. 59-289
	)	
(Three Mile Island Nuclear	)	
Station, Unit 1)	)	
	)	

OFFICE OF SELECTED  
DOCKETING & SERVICE  
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SECRET  
PROD. & UTIL. DIV.

59-289SP

THREE MILE ISLAND ALERT'S SUPPLEMENTAL RESPONSE  
TO LICENSEE'S SECOND SET OF INTERROGATORIES  
AND THREE MILE ISLAND ALERT'S RESPONSE TO LICENSEE'S  
SECOND REQUEST FOR PRODUCTION TO THREE MILE ISLAND ALERT

Three Mile Island Alert ("TMIA") submits the following supplemental response to Licensee General Public Utilities Nuclear's ("GPU's") Second Set of Interrogatories:

Interrogatory No. 2

TMIA has within its possession and control the following documents:

1. Interviews from the GPU investigation of the accident, the so-called Long-Reppert investigation.
2. Interviews from the NRC Investigation into the March 28, 1979 Three Mile Island Accident, and the report which was generated by that investigation, NUREG-0600.
3. Interviews from the NRC Investigation into Information Flow During the Accident at Three Mile Island and the report which was generated by that investigation, NUREG-0760.
4. Report prepared by the Majority Staff of the House Committee on Interior and Insular Affairs, entitled "Reporting of Information Concerning the Accident at Three Mile Island,"

DS03

March, 1981 ("Udall Report").

5. Oversight Hearings Before the Subcommittee on Energy and the Environment of the Committee on Interior and Insular Affairs, House of Representatives, Part I and II.

6. Memorandum to Chairman Ahearne from Mitchell Rogovin and George Frampton of the Special Inquiry Group re: Questions Submitted by Congressman Udall, March 4, 1980.

7. Memorandum to Dr. Dade W. Moeller, Chairman, Subcommittee on the TMI-1 Restart from Edward C. Abbott, re: Report by the Staff of the House Committee on Interior and Insular Affairs on the Reporting of Information Concerning the Accident at Three Mile Island.

8. Charts concerning TMI-2 reactor conditions for March 29, 1979.

9. Memorandum from Henry Myers to Bill Dircks, re: Comments on Gamble Memorandum and Related Matters, November 9, 1981.

10. Memorandum from Henry Myers to Bill Dircks/Norman Haller re: Basis for I&E Conclusion that Gary Miller was unaware of the pressure pulse recorded at approximately 1:50 p.m. on March 28, 1979.

11. Memorandum from Henry Myers to Bill Dircks/Norm Haller re: Basis for I&E Conclusion that pressure pulse was dismissed as an instrument anomaly (sic), November 30, 1981.

12. Memorandum from Henry Myers to Bill Dircks/Norm Haller, re: NUREG-0760 statement (p. 19): "The investigators conclude that the significance of superheated steam was not understood on March 28, 1979, by the people at the site," December 1, 1981.

13. Memorandum from Henry Myers to Bill Dircks/Norm Haller,

December 16, 1981.

14. Memorandum from Henry Myers to Bill Dircks/Norm Haller  
Re: comments on statements made at the December 21, 1981  
Commission meeting concerning information flow during the TMI  
accident.

15. Letter to Dr. D.W. Moeller from Congressman Morris  
Udall, dated July 6, 1981.

16. Letter to Honorable John F. Ahearne, from Senators  
Gary Hart and Alan Simpson, dated September 10, 1980.

17. Memorandum and attached interview from Henry Myers to  
Norman Mosely Re: Notes of a telephone conversation with Brian  
Mehler on July 6, 1979.

18. Letter from Morris Udall to Honorable Nunzio Palladino,  
February 4, 1982.

19. L.C. Rogers' "Statement of 3/28/79 Unit II Transient,"  
June 12, 1979.

20. Letter to Morris Udall from Nunzio Palladino Re:  
Response to Udall, February 4, 1982 letter (March 2, 1982).

21. Memorandum to Commissioner Gilinsky from Victor Stello,  
Jr., Re: Commissioner Gilinsky's Separate Remarks attached  
to the March 2, 1982 Letter to Congressman Udall (March 3, 1982).

22. Index and Excerpts of NRC interviews and tapes of inter-  
views compiled in the course of the NUREG-0600 investigation.

23. News articles regarding the Dieckamp mailgram NUREG-0760,  
and the Udall Report.

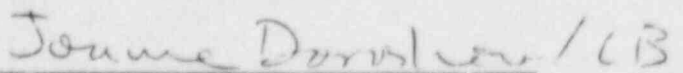
24. Memorandum to Carl Kammerer from Henry Myers Re: Response  
to Commission's Request for Comments on the List of TMI Integrity  
Issues (II), February 21, 1984.

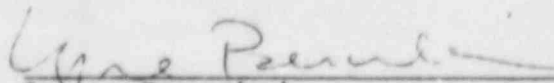
Three Mile Island Alert submits the following response to Licensee General Public Utilities' Second Request for Production:

GPU has requested a copy of each document identified in TMIA's response to Interrogatories 1 through 18 of TMIA's Response to Licensee's Second Set of Interrogatories. All documents listed in TMIA responses to interrogatories are available from the NRC's Public Document Room or have been made available in Licensee GPU's production of documents to TMIA concerning the Dieckamp mailgram issue except items 17, 22, 23 and 24 in TMIA response to Interrogatory No. 2 contained in TMIA's Supplemental Response to Licensee's Second Set of Interrogatories to TMIA.

TMIA will make these documents available for inspection and copying at normal business hours at its counsel's office at 1555 Connecticut Avenue, N.W., Suite 202, Washington, D.C. 20036.

Respectfully submitted,

  
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DATED: September 18, 1984

Attorneys for Three Mile Island  
Alert

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

Before the Atomic Safety and Licensing Board

In the Matter of ) '84 SEP 19 P12:04  
 )  
METROPOLITAN EDISON COMPANY ) Docket No. 50-289 SP  
 )  
(Three Mile Island Nuclear ) (Restart - Management Phase)  
Station, Unit No. 1) )

I hereby certify that a copy of the foregoing Three Mile Island Alert's Supplemental Response to Licensee's Second Set of Interrogatories and Three Mile Island Alert's Response to Licensee's Second Request for Production to Three Mile Island Alert has been served this 18th day of September, 1984, by mailing a copy, first class postage prepaid to the following:

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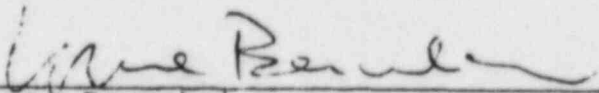


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