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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Atomic Safety and Licensing Board

'84 SEP 21 110:55

In the Matter of)
)
METROPOLITAN EDISON COMPANY)
)
(Three Mile Island Nuclear)
Station, Unit 1))
)

Docket No. 59-289 SP

THREE MILE ISLAND'S SECOND SUPPLEMENTAL
RESPONSE TO LICENSEE'S SECOND SET OF INTERROGATORIES

Three Mile Island Alert ("TMIA") submits the following second supplemental response to TMIA's Response to Licensee's Second Set of Interrogatories.

Interrogatory No. 1 (a)

TMIA currently intends to call as a witness in this reopened hearing Dr. Henry Myers, Science Adviser for the Majority Staff, Committee on Interior and Insular Affairs, U.S. House of Representatives. See attached resume of Dr. Myers.

Interrogatory No. 1 (b)

Dr. Myers is expected to testify on the subject of the 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," March, 1981.

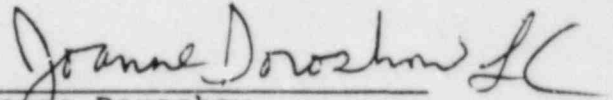
Interrogatory No. 1 (c)

The grounds for Dr. Myers' opinions and the facts to which he is expected to testify are largely contained in his report and the results of the investigation conducted to prepare the report.

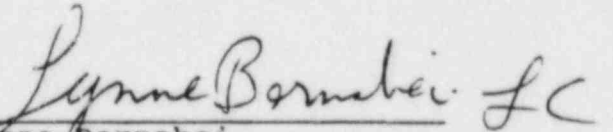
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Respectfully submitted,



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DATED: September 19, 1984

HENRY R. MYERS
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Science Adviser (since 1979)/Staff, Committee on Interior and Insular Affairs, U.S. House of Representatives, 1976 - present.

- Responsible for assisting the Interior Committee in exercise of its jurisdiction over nuclear regulation and the Nuclear Regulatory Commission. Activities include planning and conduct of Congressional oversight of the commercial nuclear industry, drafting of legislation, and preparation of reports, statements and speeches.

Director, Security Agency Study, Nuclear Regulatory Commission (NRC); March, 1975 - December, 1975.

Directed approximately 30 NRC staff and contractor professionals in preparation of Congressionally mandated report concerning the need for federal guard forces to provide security in the commercial nuclear industry.

Analyst/Technical Adviser, Federal Energy Administration; April, 1974 - February, 1975.

Conducted analyses of proposed energy projects in order to develop insights with regard to whether these projects represented an efficient use of resources. Among projects analyzed were oil production in the Santa Barbara Channel and the proposed Kaiparowits Project. (The latter analysis appears in the Kaiparowits Draft Environmental Impact Statement.) Analyzed oil price regulations with regard to their effects and internal consistency.

Staff, Federal Energy Regulation Study; September, 1973 - April, 1974.

This study was commissioned by the President to ascertain the need for Executive or Congressional action to enhance the efficiency of regulation of energy related activities. Personal responsibilities included assimilation, analysis, and presentation of data on energy regulatory activities of the Federal government.

Consultant, Myers Associates, Inc., 1968 - 1973.

Prepared studies for and/or served as a consultant to Office of the Governor of the State of Michigan, several Senators and Congressmen, the Department of Defense/Advance Research Projects Agency, the Agency for International Development, the RAND Corporation, Alyeska Pipeline Service Company, Georgetown University Law Center, the American Society of International Law, Scientific American magazine, and Saturday Review/Science magazine. In the course of providing consulting services to clients, conducted analyses of problems involving environmental quality, nuclear energy and arms control.

HENRY R. MYERS

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Technical adviser, U.S. Arms Control and Disarmament Agency (ACDA), 1962 - 1968.

Under general direction of the Assistant Director, Science and Technology, conducted studies relating to nuclear test ban treaties, anti-ballistic missile systems, chemical and biological warfare, and non-military uses of nuclear explosives; assisted in preparation of position papers recommending arms control policies to be adopted by the United States; represented ACDA on panels and inter-agency committees convened to advise heads of agencies on technical matters relating to arms control.

Research Fellow, Cambridge Electron Accelerator, Harvard/M.I.T., 1959 - 1962.

Responsible for design and construction of instruments associated with operation and use of the 6 billion volt electron accelerator.

Research Assistant and Graduate Student, California Institute of Technology, 1954 - 1959.

Assisted in modification of electron synchrotron and participated in synchrotron experiments while pursuing graduate studies. Ph.D. thesis: Elastic Photodisintegration of the Deuteron between 500 and 900 MEV.

PUBLICATIONS:

With others: Neutrons in Coincidence with High Energy Photoprotons, Phys. Rev. 95 No. 2, 576 - 577 (1954).

Primary author: Photodisintegration of the Deuteron from 500 to 900 MEV, Phys. Rev. 121 No. 2, 630 - 635 (1961).

Co-author: Plowshare Evaluation, chapter in Nuclear Proliferation: Prospects for Control, Dunellen, 1970.

Author: Will a Test Ban Work?, Washington Post Outlook, May 16, 1971.

Author: Extending the Nuclear Test Ban, Scientific American, January 1972.

Author: Comprehensive Test Ban Treaty: Grounds for Objection Diminish, Science Magazine, January 21, 1972.

Author: Navy F-14: New Fighter's Cost, Sophistication Cause Controversy, Science Magazine, April 7, 1972.

PUBLICATIONS (continued):

Author: Does Washington Need an ABM?, Washington Post Outlook, July 30, 1972.

Author: Federal Decision-Making and the Trans-Alaska Pipeline, University of California Ecology Law Quarterly, 1975.

Author: Safeguards in the Domestic Nuclear Industry, House Interior Committee Staff Report, U.S. Government Printing Office (1976).

Author: Observations on the Reactor Safety Study, House Interior Committee Staff Report, U.S. Government Printing Office (1977).

Author: Reporting of Information During the Accident at Three Mile Island, House Interior Committee Staff Report, U.S. Government Printing Office (1981).

EDUCATION:

Public Schools; Waterbury, Connecticut; graduated from Crosby High School in 1950.

Massachusetts Institute of Technology; S.B. (Physics), 1954.

California Institute of Technology; S.M. (Physics), 1955; Ph.D. (Physics), 1960.

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NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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In the Matter of)
) '84 SEP 21 110:55
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 TMIA's Second Supplemental Response to Licensee's Second Set of Interrogatories; Application for Issuance of Subpoena Duces Tecum; Subpoena to William Yeager; and Letter to Judge Ivan W. Smith have been served this 19th day of September, 1984, by mailing a copy, first class postage prepaid to the following:

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