

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

Before the Commission

'85 FEB 11 A10:52

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

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Docket No. 50-289 *SP*  
(Restart-Management  
Phase)

TMIA'S REQUEST TO MAKE  
ORAL PRESENTATION

TMIA has been notified that on February 13, 1985, the Commission plans to discuss and likely decide which hearings will be necessary to resolve management integrity questions, and which if any hearings must be held before a restart vote.

Since the last opportunity for the parties to comment on these matters, hearings on two issues have been held, Findings of Fact and Conclusions of Law have been filed on one, and informal discovery has begun on the other two. In addition, there is now a significant question as to the validity of the entire restart hearing process, in light of recent actions by Licensing Board Judge Ivan W. Smith, who has chaired the restart Licensing Board since its inception, and efforts by all parties in the restart proceeding, save Licensee, to obtain his recusal.

Because of these significant new developments in the Licensing Board process, including a substantial amount of new material developed in the hearing process to date, TMIA hereby requests to

8502130021 850211  
PDR ADOCK 05000289  
PDR

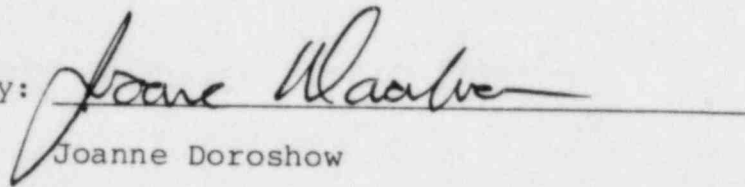
D502

make an oral presentation before the Commission at its scheduled February 13, 1985 meeting, to address these new developments, before the Commission makes a formal decision on the matters now before it.

Respectfully submitted,

THREE MILE ISLAND ALERT, INC.

By:

A handwritten signature in cursive script, appearing to read "Joanne Doroshow", is written over a horizontal line. The signature is fluid and somewhat stylized.

Joanne Doroshow

February 11, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

'85 FEB 11 A10:52

Before the Commission

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

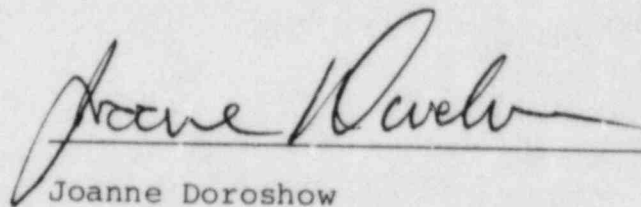
METROPOLITAN EDISON COMPANY )

(Three Mile Island Nuclear )  
Station, Unit 1) )

Docket No. 50-289  
(Restart-Management  
Phase)

CERTIFICATE OF SERVICE

I hereby certify that copies of TMIA's Request to Make Oral Presentation was served this 11th day of February, 1985, by deposit in the U.S. mail, first class, postage prepaid, or hand-delivered where possible, to all parties on the attached service list.

  
Joanne Doroshov

SERVICE LIST

Chairman Palladino U.S. N.R.C. Washington, D.C. 20555	Commissioner Asselstine U.S. N.R.C. Washington, D.C. 20555
Commissioner Bernthal U.S. N.R.C. Washington, D.C. 20555	Commissioner Roberts U.S. N.R.C. Washington, D.C. 20555
Commissioner Zech U.S. N.R.C. Washington, D.C. 20555	
Judge Gary Edles, ASLAB U.S. N.R.C. Washington, D.C. 20555	
Judge John H. Buck, ASLAB U.S. N.R.C. Washington, D.C. 20555	Judge Christine Kohl, ASLAB U.S. N.R.C. Washington, D.C. 20555
Ivan W. Smith, Esq., ASLB U.S. N.R.C. Washington, D.C. 20555	Sheldon Wolfe, Esq. U.S. N.R.C. Washington, D.C. 20515
	Gustave A. Linenberger, Jr. U.S. N.R.C. Washington, D.C. 20555
Lynne Bernabei Government Accountability Project 1555 Connecticut Ave. N.W. Washington, D.C. 20009	Thomas Au, Esq. Department of Environmental Resources 505 Executive House P.O. Box 2357 Harrisburg, PA 17120
Bob Pollard UCS Dupont Circle Building 1346 Connecticut Ave. Washington, D.C. 20036	Ellyn Weiss, Esq. Harmon, Weiss & Jordon 2001 S St. N.W., Suite 430 Washington, D.C. 20009
	Jack Goldberg Office of Executive Legal Director Washington, D.C. 20555
George F. Trowbridge, Esq. Shaw, Pittman, Potts & Trowbridge 1800 M St. N.W. Washington, D.C. 20036	Ms. Marjorie Aamodt R.D. 5 Coatesville, PA 19320
Docketing and Service U.S. N.R.C. Washington, D.C. 20555	