SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1800 M STREET, N. W. WASHINGTON, D. C. 20036

(202) 822-1000

AMSAY D. POTTS, P.C.

(EUART L. PITTMAN, P.C.
EORGE F TROWBRIDGE, P.C.
EEPHEN D. POTTS, P.C.
ERALD CHARNOFF, P.C.
HILLIP D. BOSTWICK, P.C.
HILLIP D. BOSTWICK, P.C.
TIMOTHY HANLON, P.C.
EORGE M. ROGERS, JR., P.C.
RED. A. HILLIE ANDER, P.C.
RED. A. HILLIE ANDER, P.C.
ESLIE A. NICHOLSON, JR. P.C.
LESLIE A. NICHOLSON, JR. P.C.
ARTHN D. KRALL, P.C.
FRED DRASKER, P.C.
R. KENLY WEBSTER, P.C.
MARKA AUGENBLICK, JR. P.C.
ENNET DE BLANDES, P.C.
THOMAS A. BAXTER, P.C.
THOMAS A. BAXTER, P.C.
THOMAS A. BAXTER, P.C.
THOMAS A. BAXTER, P.C. ARK AUGENBLICK, P.C.
RRESTON B. JONES, P.C.
RRESTON S. JONES, P.C.
RRESTON S. JONES, P.C.
ROMAS A. BAXTER, P.C.
HELDON J. WEISEL, P.C.
PATRICK HICKEY, P.C.
THOMAS LENHART, P.C.
EVEN L. MELTZER, P.C.
EAN D. AULICK, P.C.
HN ENGEL, P.C.
THOMAS HICKS III, P.C.
BERTE B. CENKIN, P.C.
EPHEN B. HUTTLER, P.C.
MES B. HAMLIN, P.C.
MES B. HAMLIN, P.C.

RANDAL B. KELL. P.C.

B. SCOTT CUSTER JR
ROBERT E. ZAHLER. P.C.
ROBERT B. ROBBINS. P.C.
STEVEN M. LUCAS. P.C.
DAVID M. RUBENSTEIN. P.C.
MATIAS F. TRAVIESO D.R.C.
JAYA E. PSTIEN. P.C.
JAYA A. PSTIEN.

KENNETH J. HAUTMAN
DAVID LAWRENCE MILLER
FREDERICK L. EM
STEVEN P. BITLER
RICHARD J. PARRINO
ELLEN A FREDEL
MARIEN DOLAND'
THOMAS C. HILL
L. DUANE CHEEK
MICHAEL K. MADRIEN
RANNAH E. M. LIEBERMAN
JUDITH A SANDLER
ANDREW D. ELLIS
RICHARD A SAME
THOMAS E. CROCKER, JR.
VICK! R. HARDING
PETER J. PERRARA
MELEN J. PERRARA
MELEN TORELLE
PAUL S. PILECK!
PAU

SYLVIA M LOTRECK
JEFFREY R SNYDER*
DARYL ANNE LANDER
PHILIP D. PORTER
MICHAEL A. SWIGER
ELLEN SHERIFF
ANITA J FINKELSTEIN
DAVID R SAHRIFF
ANITA J FINKELSTEIN
DAVID R SAHRIFF
ANITA J FINKELSTEIN
DAVID R SAHRIFF
ANITA J SAHRIFF
ANITA J SAHRIFF
ANITA J SAHRIFF
ANITA J SAHRIFF
ANITA SA

NOT ADMITTED IN G.C.

* ADMITTED IN VIRGINIA

WRITER'S DIRECT DIAL NUMBER

February 13, 1985 (202) 822-1215

Administrative Judges Ivan W. Smith, Chairman Sheldon J. Wolfe Gustave A. Linenberger, Jr. Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> In the Matter of Metropolitan Edison Company (Three Mile Island Nuclear Station, Unit No. 1) Docket No. 50-289 SP (Restart Remand on Management - Training

Dear Chairman Smith and Administrative Judges Wolfe and Linenberger:

Enclosed are Licensee's Proposed Findings of Fact and Conclusions of Law on the Issue of Licensed Operator Training at TMI-1. Licensee forwarded to the parties several weeks ago an outline of a suggested format for proposed findings, with which the enclosed proposed findings comport. The NRC Staff and UCS each have indicated that, in general, they are optimistic about following Licensee's format. (Mr. Jordan stated that it was premature for him to commit to the suggested outline. Ms. Wagner was uncertain about the order of the major sections of the outline; however, the outline's fundamental organization of

8502150089 850213 PDR ADOCK 05000289

SHAW, PITTMAN, POTTS & TROWBRIDGE

Ivan W. Smith, Esquire Sheldon J. Wolfe, Esquire Mr. Gustave A. Linenberger, Jr. February 13, 1985 Page 2

the record was satisfactory to her.) Licensee has not heard from TMIA or the Commonwealth of Pennsylvania about the proposed findings outline. However, Licensee is hopeful that the Board's review of the record and of the parties' positions will be facilitated by a consistent proposed findings format. In addition, both UCS and the NRC Staff indicated an intention to adopt findings of fact proposed by Licensee with which they concur.

Sincerely,

Deborah B. Bauser

Deborah B. Bauser Counsel for Licensee

DBB: jah Enclosure

cc: per Certificate of Service

February 13, 1985

DOCKET

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

*85 FEB 14 A10:45

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of counsel for Licensee's letter to the Licensing Board and "Licensee's Proposed Findings of Fact and Conclusions of Law on the Issue of Licensed Operator Training at TMI-1" were served by hand delivery on February 14, 1985 to the parties identified with an asterisk and by deposit in the U.S. mail, first class, postage prepaid, this 13th day of February, 1985, to the other parties on the attached Service List.

Deborah B. Bauser

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

SERVICE LIST

Nunzio J. Palladino, Chairman U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Thomas M. Roberts, Commissioner U.S. Nuclear Regulatory Commission Washington, D.C. 20555

James K. Asselstine, Commissioner U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Frederick Bernthal, Commissioner U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Lando W. Zech Jr., Commissioner U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Administrative Judge
Gary J. Edles, Chairman
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
John H. Buck
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Christine N. Kohl
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

- * Administrative Judge
 Ivan W. Smith, Chairman
 Atomic Safety & Licensing Board
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555
- * Administrative Judge Sheldon J. Wolfe Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

* Administrative Judge
Gustave A. Linenberger, Jr.
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Atomic Safety & Licensing Appeal Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

- * Jack R. Goldberg, Esq. (4)
 Office of the Executive Legal
 Director
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555
- * Thomas Y. Au, Esq.
 Office of Chief Counsel
 Department of Environmental
 Resources
 505 Executive House
 P.O. Box 2357
 Harrisburg, PA 17120

Mr. Henry D. Hukill Vice President GPU Nuclear Componation P.O. Box 480 Middletown, PA 17057

Mr. and Mrs. Norman Aamodt R.D. 5 Coatesville, PA 19320

- * Ms. Louise Bradford TMI ALERT 1011 Green Street Harrisburg, PA 17102
- * Joanne Doroshow, Esquire
 The Christic Institute
 1324 North Capitol Street
 Washington, D.C. 20002
 Lynne Bernabei, Esq.
 Government Accountability
 Project
 1:555 Connecticut Avenue

Washington, D.C. 20036

Ellyn R. Weiss, Esq.
Harmon, Weiss & Jordan
2001 S Street, N.W., Suite 430
Washington, D.C. 20009

Michael F. McBride, Esq. LeBoeuf, Lamb, Leiby & MacRae 1333 New Hampshire Avenue, N.W. Suite 1100 Washington, D.C. 20036

Michael W. Maupin, Esq. Hunton & Williams 707 East Main Street P.O. Box 1535 Richmond, VA 23212

William T. Russell
Deputy Director, Division
of Human Factors Safety
Office of NRR
Mail Stop AR5200
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555