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RELATED CORRESPONDENCE

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USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
)	
GPU NUCLEAR CORPORATION, <u>et al.</u>)	Docket Nos. 50-289-OLA
)	and 50-289-OLA-2
)	
(Three Mile Island Nuclear Station,))	
Unit No. 1))	

LICENSEE'S FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

These interrogatories and request for production of documents are directed to Three Mile Island Alert ("TMIA") pursuant to 10 C.F.R. §§ 2.740(b) and 2.741 and the Atomic Safety and Licensing Board's oral rulings made on March 27, 1986, following the prehearing conference.

In accordance with 10 C.F.R. § 2.740(b) and the Board's oral rulings (Tr. at 127), answers or objections to these interrogatories must be served within 14 days after service of the interrogatories. Pursuant to the Board's oral rulings (Tr. at 127), responses or objections to the request for production of documents must be served within 20 days after service of the request.

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These interrogatories are intended to be continuing in nature, and the answers should promptly be supplemented or amended as appropriate, pursuant to 10 C.F.R. § 2.740(e), should TMIA or any individual acting on its behalf obtain any new or differing information responsive to these interrogatories. The request for production of documents is also continuing in nature and TMIA must produce immediately any additional documents it, or any individual acting on its behalf, obtain which are responsive to the request, in accordance with the provisions of 10 C.F.R. § 2.740(e).

I. Instructions

The following instructions and definitions apply to Licensee's interrogatories and request for production of documents.

1. When identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, transcript, report, handwritten notes, test data) and provide the following information as applicable: (a) document name; (b) title; (c) number; (d) author; (e) date of publication; (f) addressee; (g) date written or approved; and (h) the name and address of the person or persons having possession of the document. Also specify the portion or portions of the document

(whether section(s), chapter(s) or page(s)) upon which TMIA relies.

2. When identification of a person is requested, state that person's full name, present employer or business affiliation, present address, and present telephone number.

3. At the end of each answer to each interrogatory, identify each person who had information upon which TMIA relied in answering the interrogatory, and each person who answered the interrogatory.

4. As used hereinafter, the following definitions shall apply:

"Change Request 148" means Licensee's November 6, 1985 Technical Specification Change Request No. 148.

"Change Request 153" means Licensee's February 4, 1986 Technical Specification Change Request No. 153.

"ECT" means eddy current testing.

"Licensee" means GPU Nuclear Corporation.

"NRC" refers to the staff of the Nuclear Regulatory Commission.

"Document(s)" means all writings and records of every type in possession, control, or custody of TMIA or any individual acting on its behalf, including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, test data,

charts, books, pamphlets, notes, articles, transcripts, voice recordings and all other writings or recordings of any kind; "document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of TMIA; a document shall be deemed to be in "control" of TMIA or any individual acting on its behalf if they have ownership, possession or custody of the document or copy thereof, or have the right to secure the document or copy thereof, from any person or public or private entity having physical possession thereof.

"TMIA" is intended to encompass the organization called Three Mile Island Alert, Inc., its members, and its representatives.

"TMI-1" refers to Three Mile Island Nuclear Station, Unit No. 1.

II. General Interrogatories

Interrogatory 1

For each contention, identify each person known to TMIA to have first-hand knowledge of the facts alleged, and upon which TMIA relied in formulating the contentions, and identify those facts concerning which each said person has first-hand knowledge.

Interrogatory 2

For each contention, identify each person who provided information upon which TMIA relied in answering each interrogatory herein, and identify all such information which was provided by each such person and the specific interrogatory response in which such information is contained.

Interrogatory 3

Identify each person TMIA intends to call as a witness or expert witness relating to any contention which is the subject of this set of interrogatories.

(a) For each such person, state his or her educational, vocational, and professional qualifications.

(b) Identify the contention(s) regarding which each such person is expected to testify.

(c) State the subject matter to which each such person is expected to testify.

III. Specific Interrogatories

Contention 1 (Form and Rate of New Tube Degradation)

Interrogatory 1.1

Explain in detail what is meant by the term "new tube degradation" in Contention 1.

Interrogatory 1.2

(a) State in detail all facts which support TMIA's contention that the TMI-1 steam generator tubes are experiencing "new tube degradation."

(b) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the steam generator tubes are experiencing "new tube degradation."

Interrogatory 1.3

(a) Does TMIA allege that "new tube degradation" will occur in the future?

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts which support TMIA's allegation that "new tube degradation" will occur in the future.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing

the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that "new tube degradation" will occur in the future.

Interrogatory 1.4

(a) Describe in detail each mechanism by which TMIA alleges the steam generator tubes are experiencing or will experience "new tube degradation."

(b) For each mechanism described in TMIA's answer to the preceding interrogatory, state in detail all facts supporting TMIA's allegation that the steam generator tubes are experiencing or will experience "new tube degradation."

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the steam generator tubes are experiencing or will experience "new tube degradation."

Interrogatory 1.5

(a) State in detail all facts which support TMIA's allegation that the form of "new tube degradation" has not been determined.

(b) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the form of "new tube degradation" has not been determined.

Interrogatory 1.6

(a) State in detail all facts which support TMIA's allegation that the rate of "new tube degradation" has not been determined.

(b) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the rate of "new tube degradation" has not been determined.

Interrogatory 1.7

(a) Does TMIA allege that a failure to determine the form of "new tube degradation" means that the plugging limit should not be changed from 40% to 50% throughwall under the conditions proposed by Licensee in Change Request 153?

(b) If the answer to the preceding interrogatory is other than negative, state in detail all facts which support TMIA's allegation that a failure to determine the form of "new tube degradation" means that the plugging limit should not be changed from 40% to 50% throughwall under the conditions proposed by Licensee in Change Request 153.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that a failure to determine the form of "new tube degradation" means that the plugging limit should not be changed from 40% to 50% throughwall under the conditions proposed by Licensee in Change Request 153.

Interrogatory 1.8

(a) Does TMIA allege that a failure to determine the form of "new tube degradation" means that the plugging limit should not be increased from 40% as proposed by Licensee in Change Request 148?

(b) If the answer to the preceding interrogatory is other than negative, state in detail all facts which support TMIA's allegation that a failure to determine the form of "new tube degradation" means that the plugging limit should not be increased from 40% throughwall as proposed by Licensee in Change Request 148.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that a failure to determine the form of "new tube degradation" means that the plugging limit should not be increased from 40% as proposed by Licensee in Change Request 148.

Interrogatory 1.9

(a) Does TMIA allege that a failure to determine the rate of "new tube degradation" means that the plugging limit should not be changed from 40% to 50% throughwall under the conditions proposed by Licensee in Change Request 153?

(b) If the answer to the preceding interrogatory is other than negative, state in detail all facts which support TMIA's allegation that a failure to determine the rate of "new tube degradation" means that the plugging limit should not be changed from 40% to 50% throughwall under the conditions proposed by Licensee in Change Request 153.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that a failure to determine the rate of "new tube degradation" means that the plugging limit should not be changed from 40% to 50% throughwall under the conditions proposed by Licensee in Change Request 153.

Interrogatory 1.10

(a) Does TMIA allege that a failure to determine the rate of "new tube degradation" means that the plugging limit should not be increased from 40% as proposed by Licensee in Change Request 148?

(b) If the answer to the preceding interrogatory is other than negative, state in detail all facts which support TMIA's allegation that a failure to determine the rate of "new tube degradation" means that the plugging limit should not be increased from 40% throughwall as proposed by Licensee in Change Request 148.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that a failure to determine the rate of "new tube degradation" means that the plugging limit should not be increased from 40% throughwall as proposed by Licensee in Change Request 148.

Interrogatory 1.11

(a) Does TMIA allege that corrosion has reinitiated since 1982?

(b) Describe in detail each type of corrosion which TMIA alleges has occurred since 1982.

(c) State in detail all facts which support TMIA's allegation that corrosion has reinitiated since 1982.

(d) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that corrosion has reinitiated since 1982.

Interrogatory 1.12

(a) Does TMIA allege that the steam generator tubes have experienced new intergranular attack ("IGA") since 1982?

(b) If the answer to the preceding interrogatory is affirmative, state all facts supporting TMIA's allegation that the steam generator tubes have experienced new IGA since 1982.

(c) In addition, describe in detail the mechanism by which the new IGA is occurring.

(d) State in detail all facts supporting TMIA's answer to the preceding interrogatory.

(e) For each fact set forth in the response to Interrogatories (a), (b), (c) and (d) above, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the steam generator tubes have experienced IGA since 1982.

Interrogatory 1.13

(a) Does TMIA allege that new IGA has occurred since 1984?

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts supporting TMIA's allegation that new IGA has occurred since 1984.

(c) In addition, describe in detail the mechanism by which the new IGA is occurring.

(d) State in detail all facts supporting TMIA's answer to the preceding interrogatory.

(e) For each fact set forth in the response to Interrogatories (a), (b), (c) and (d) above, (i) identify each document

upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that new IGA has occurred since 1984.

Interrogatory 1.14

(a) Does TMIA allege that existing IGA will continue?

(b) If the answer to the preceding interrogatory is affirmative, describe in detail the mechanism by which the existing IGA will continue and state in detail all facts supporting TMIA's answer to this interrogatory.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that existing IGA will continue.

Interrogatory 1.15

(a) To what depths (tube wall penetration) has IGA progressed in the steam generator tubes?

(b) State in detail all facts supporting your answer to the preceding interrogatory.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's answers to Interrogatories (a) and (b) above.

Interrogatory 1.16

(a) Does TMIA contend that new or existing IGA will penetrate to 40% or greater throughwall?

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts supporting TMIA's assertion that new or existing IGA will penetrate to 40% or greater throughwall.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that

new or existing IGA will penetrate to 40% or greater throughwall.

Interrogatory 1.17

(a) Does TMIA contend that new or existing IGA will penetrate to 50% or greater throughwall?

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts supporting TMIA's assertion that new or existing IGA will penetrate to 50% or greater throughwall.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that new or existing IGA will penetrate to 50% or greater throughwall.

Interrogatory 1.18

(a) Does TMIA contend that new or existing IGA will penetrate to 60% or greater throughwall?

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts supporting TMIA's

assertion that new or existing IGA will penetrate to 60% or greater throughwall.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that new or existing IGA will penetrate to 60% or greater throughwall.

Interrogatory 1.19

(a) Does TMIA contend that new or existing IGA will penetrate to 70% or greater throughwall?

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts supporting TMIA's assertion that new or existing IGA will penetrate to 70% or greater throughwall.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how

such information relates to and supports TMIA's allegation that new or existing IGA will penetrate to 70% or greater throughwall.

Interrogatory 1.20

(a) Does TMIA allege that intergranular stress-assisted cracking ("IGSAC") has reinitiated in the steam generator tubes since 1982?

(b) If the answer to the preceding interrogatory is affirmative, describe in detail the mechanism by which the IGSAC was reinitiated and state in detail all facts supporting your answer to this interrogatory.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that IGSAC has reinitiated in the steam generator tubes since 1982.

Interrogatory 1.21

(a) Does TMIA allege that the steam generator tubes have experienced new IGSAC since 1984?

(b) If the answer to the preceding interrogatory is affirmative, describe in detail the mechanism by which the steam generator tubes have experienced IGSAC since 1984 and state in detail all facts supporting your answer to this interrogatory.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the steam generator tubes have experienced new IGSAC since 1984.

Interrogatory 1.22

(a) State in detail all facts which support the allegation that the alleged failure to "size metallographically" the "scattered IGA and shallow cracking" affects the conclusions drawn from Licensee's long term corrosion test ("LTCT") program with respect to the cause of "new cracking." Tr. at 18.

(b) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii)

specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that a failure to size metallographically the scattered IGA and shallow tracking affects the conclusion drawn from Licensee's LTCT program with respect to the cause of new cracking.

Interrogatory 1.23

(a) Explain in detail precisely why you allege that Licensee's LTCT program has not established that "new tube degradation" is not occurring or continuing.

(b) State in detail all facts supporting your answer to the preceding interrogatory.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that Licensee's LTCT program has not established that "new tube degradation" is not occurring or continuing.

Interrogatory 1.24

(a) Explain in detail the significance of sizing cracks metallographically in the LTCT program.

(b) State in detail all facts supporting your answer to the preceding interrogatory.

(c) For each fact set forth in the response to Interrogatories (a) and (b) above, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's answers to Interrogatories (a) and (b) above.

Interrogatory 1.25

(a) Explain in detail the significance of Licensee's alleged failure to metallographically size cracks as part of the LTCT program.

(b) State in detail all facts supporting your answer to the preceding interrogatory.

(c) For each fact set forth in the response to Interrogatories (a) and (b) above, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document

containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's answers to Interrogatories (a) and (b) above.

Interrogatory 1.26

(a) State in detail all facts supporting TMIA's allegation that "B&W in particular refused to conclude that new corrosion may not have occurred." Tr. at 17.

(b) For each fact set forth in the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to support its answer to the preceding interrogatory, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information supports TMIA's allegation that B&W refused to conclude that new corrosion may not have occurred.

Interrogatory 1.27

(a) Explain in detail precisely why TMIA alleges that the 1984 ECT results do not support Licensee's conclusion that the 1984 ECT indications were not the result of new crack growth.

(b) State in detail all facts supporting TMIA's answer to the preceding interrogatory.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the 1984 ECT results do not support Licensee's conclusion that the 1984 ECT indications were not the result of new crack growth.

Interrogatory 1.28

(a) Explain in detail how the "variations in this throughwall depth and the circumferential length" of the 1984 ECT indications supports TMIA's allegation that the steam generators are experiencing new tube degradation. Tr. at 16.

(b) State in detail all facts supporting TMIA's answer to the preceding interrogatory.

(c) For each fact set forth in the response to Interrogatories (a) and (b) above, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's answers to Interrogatories (a) and (b) above.

Interrogatory 1.29

(a) Does TMIA allege that the IGA patches in the steam generator tubes are not the result of the initial tube failure in 1981? Tr. at 16.

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts supporting TMIA's allegation that the IGA patches in the steam generator tubes are not the result of the initial tube failure in 1981.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the IGA patches in the steam generator tubes are not the result of the initial tube failure in 1981.

Interrogatory 1.30

(a) State in detail all facts which support TMIA's allegation that "not all of [the 1984] indications can be found" in the "1982 tapes. . . ." Tr. at 16-17.

(b) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which

TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that not all of the 1984 indications can be found in the 1982 tapes.

Interrogatory 1.31

(a) Does TMIA allege that Licensee must perform destructive tests on pulled tubes in order to satisfactorily demonstrate that no new tube degradation is occurring? Tr. at 20.

(b) If the answer to the preceding interrogatory is yes, explain in detail why Licensee must perform destructive tests on pulled tubes in order to satisfactorily demonstrate that no new tube degradation is occurring.

(c) State in detail all facts supporting TMIA's answer to the preceding interrogatory.

(d) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that Licensee must perform destructive tests on pulled tubes in

order to satisfactorily demonstrate that no new tube degradation is occurring.

Interrogatory 1.32

(a) Describe in detail all "environmental effects" TMIA alleges Licensee did not consider with respect to Change Request 148. Tr. at 84.

(b) State in detail all facts supporting your allegation that Licensee did not consider environmental effects in proposing the revised plugging limit in Change Request 148.

(c) For each fact set forth in the response to Interrogatories (a) and (b) above, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's answers to Interrogatories (a) and (b) above.

Interrogatory 1.33

(a) Describe in detail all "environmental effects" TMIA alleges Licensee did not consider with respect to Change Request 153. Tr. at 84.

(b) State in detail all facts supporting your allegation that Licensee did not consider environmental effects in proposing the revised plugging limit in Change Request 153.

(c) For each fact set forth in the response to Interrogatories (a) and (b) above, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's answers to Interrogatories (a) and (b) above.

Interrogatory 1.34

(a) Identify the provisions in GDC 31 which require that the "environmental effects" identified in the responses to Interrogatories 1.32 and 1.33 be considered.

(b) Explain in detail precisely how each of the environmental effects TMIA alleges that Licensee did not consider in proposing Change Requests 148 and 153 is mandated by GDC 31.

(c) Identify each document upon which TMIA relies to support its answer to Interrogatories (a) and (b) above; specify the sections and pages of each such document containing the information relied upon; and explain in detail how such information supports TMIA's answer to Interrogatories (a) and (b) above.

Interrogatory 1.35

(a) Identify the provisions in ASME Section XI which TMIA alleges require that the environmental effects described in response to Interrogatories 1.32 and 1.33 be considered.

(b) Explain in detail precisely how the provisions of ASME Section XI require that each such environmental effect that Licensee allegedly did not consider in proposing Change Requests 148 and 153 must be considered.

(c) Identify each document upon which TMIA relies in responding to Interrogatories (a) and (b) above; specify the section and pages of each such document containing the information relied upon; and explain in detail how such information relates to and supports TMIA's response to Interrogatories (a) and (b) above.

Interrogatory 1.36

(a) Explain in detail how the provisions of GDC 31 have not been complied with.

(b) Identify each document upon which TMIA relies to respond to the preceding interrogatory; specify the sections and pages of each such document containing the information relied upon; and explain in detail how such information relates to and supports TMIA's response to the preceding interrogatory.

Interrogatory 1.37

(a) Explain in detail how the provisions of ASME Section XI have not been complied with.

(b) Identify each document upon which TMIA relies to respond to the preceding interrogatory; specify the sections and pages of each such document containing the information relied upon; and explain in detail how such information relates to and supports TMIA's response to the preceding interrogatory.

Interrogatory 1.38

(a) Explain in detail what type of "tube wear" TMIA is referring to in TMIA's Motion to Broaden Hearing Scope, pg. 4 n.3 (March 10, 1986).

(b) Explain in detail how (1) hot functional testing, (2) plant operation, and (3) flow patterns contribute to such "tube wear."

(c) Explain in detail how such "tube wear" relates to:

- (1) new tube degradation,
- (2) IGA, and
- (3) pitting.

(d) State in detail all facts supporting TMIA's responses to Interrogatories (a), (b) and (c) above.

(e) For each fact set forth in the response to Interrogatories (a), (b), (c) and (d) above, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's answers to Interrogatories (a), (b), (c) and (d) above.

Interrogatory 1.39

(a) Does TMIA contend that thermal and hydraulic loadings on the tubes will cause or contribute to the rate of "new tube degradation?" Tr. at 17.

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts which support TMIA's allegation that thermal and hydraulic loadings will cause or contribute to the rate of "new tube degradation."

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that thermal and hydraulic loadings on the tubes will cause or contribute to the rate of "new tube degradation."

Interrogatory 1.40

(a) Does TMIA contend that new flow patterns from previous plugging will cause or contribute to "new tube degradation?" Tr. at 17.

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts which support TMIA's allegation that new flow patterns from previous plugging will cause or contribute to "new tube degradation."

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that new flow patterns from previous plugging will cause or contribute to "new tube degradation."

Interrogatory 1.41

(a) Does TMIA allege that grain dropout will continue, or does it allege that grain dropout has been completed or will not continue?

(b) Explain in detail the basis for TMIA's answer to the preceding interrogatory and state in detail all facts supporting TMIA's answer thereto.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's answer to the preceding interrogatory.

(d) If TMIA alleges that grain dropout will continue, explain in detail how that would be adverse to a determination that the plugging limit may be changed as requested in Change Requests 148 and 153.

(e) If TMIA alleges that grain dropout has been completed or will not continue, explain in detail how that would be adverse to a determination that the plugging limit may be changed as requested in Change Requests 148 and 153.

(f) State in detail all facts supporting TMIA's answer to Interrogatories (d) and (e) above.

(g) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's answer to the preceding interrogatory.

Interrogatory 1.42

(a) State in detail all facts which support TMIA's allegation that "radioactive deposits have built up on the outer diameter of the steam generator tubes." Tr. at 17.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that "radioactive deposits have built up on the outer diameter of the steam generator tubes."

Interrogatory 1.43

(a) Does TMIA contend that the alleged "radioactive deposits" will cause or contribute to "new tube degradation?" Tr. at 17.

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts which support the allegation that the alleged "radioactive deposits" will cause or contribute to "new tube degradation."

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which

TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that radioactive deposits will cause or contribute to "new tube degradation."

Interrogatory 1.44

(a) Identify the "new evidence which has come to light as a result of the 1984 indications [which] has not been litigated by the Board." Tr. at 19.

(b) Explain how the "new evidence" supports TMIA's contention that the steam generator tubes have experienced new degradation.

(c) Identify each document upon which TMIA relies in response to Interrogatories (a) and (b) above; specify the sections and pages of each such document containing the information relied upon; and explain in detail how such information relates to and supports TMIA's responses to Interrogatories (a) and (b) above.

Interrogatory 1.45

(a) In the Steam Generator Repair Proceedings to which TMIA was a party, Docket No. 50-289 OLA, the Atomic Safety and Licensing Board ("Licensing Board") found that the form of corrosion which had occurred on the inner diameter ("ID") of the TMI-1 steam generator tubes had been identified, that the cause of the corrosion had been identified and arrested, and that the corrosion was no longer continuing. Is it TMIA's contention that the record before the Licensing Board did not support the conclusion that the form of corrosion had been identified and that it was not continuing?

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts supporting the allegation that the record before the Licensing Board did not support the conclusion that the form of the corrosion had been identified and that it was not continuing.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the record before the Licensing Board did not support the

conclusion that the form of corrosion had been identified and that it was not continuing.

(d) Is it TMIA's contention that new information subsequent to the closing of the record before the Licensing Board undermines or casts doubt on the Licensing Board's conclusions that the form of the corrosion had been identified and that it was not continuing?

(e) If the answer to the preceding interrogatory is affirmative, describe in detail and identify by specific document citation all such new information, and state in detail all facts supporting the allegation that such new information subsequent to the closing of the record before the Licensing Board undermines or casts doubt on the Licensing Board's conclusions that the form of the corrosion had been identified and that it was not continuing.

(f) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that new information subsequent to the closing of the record before the Licensing Board undermines or casts doubt on the Licensing

Board's conclusions that the form of the corrosion had been identified and that it was not continuing.

Interrogatory 1.46

(a) In the Steam Generator Repair Proceedings to which TMIA was a party, Docket No. 50-289 OLA, the Atomic Safety and Licensing Appeal Board ("Appeal Board") affirmed the Licensing Board's conclusion "that the cause of the corrosion had been properly identified and that there was reasonable assurance that corrosion would not begin again." ALAB-807, 21 N.R.C. 1195, 1203. See also id. at 1205, 1209, 1210. Is it TMIA's contention that the record before the Appeal Board did not support the conclusion that the form of corrosion had been identified and that it was not continuing?

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts supporting the allegation that the record before the Appeal Board did not support the conclusion that the form of the corrosion had been identified and that it was not continuing.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing

the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the record before the Appeal Board did not support the conclusion that the form of corrosion had been identified and that it was not continuing.

(d) Is it TMIA's contention that new information subsequent to the Appeal Board proceedings undermines or casts doubt on the Appeal Board's conclusions that the form of the corrosion had been identified and that it was not continuing?

(e) If the answer to the preceding interrogatory is affirmative, describe in detail and identify by specific document citation to all such new information, and state in detail all facts supporting the allegation that such new information subsequent to the Appeal Board proceedings undermines or casts doubt on the Appeal Board's conclusions that the form of the corrosion had been identified and that it was not continuing.

(f) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such fact, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that new information subsequent to the Appeal Board proceedings

undermines or casts doubt on the Appeal Board's conclusions that the form of the corrosion had been identified and that it was not continuing.

Contention 2 (Accuracy of Testing Technique)

Interrogatory 2.1

In Contention 2, explain what is meant by the terms:

- (a) "IGA"
- (b) "pitting"

Interrogatory 2.2

(a) Is there a difference between "IGA" and "pitting" as used in Contention 2?

(b) If the answer to the preceding interrogatory is affirmative, explain the difference.

Interrogatory 2.3

(a) Does TMIA allege that "pitting" has occurred or could occur in the TMI-1 steam generator tubes in the absence of "IGA"?

(b) If the answer to the preceding interrogatory is affirmative, state in detail all facts which support TMIA's allegation that pitting has occurred or could occur in the absence of IGA.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely to establish such facts, (ii) specify the sections and pages of each such document containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that pitting has occurred or could occur by a mechanism other than IGA.

Interrogatory 2.4

(a) Identify the "testing technique" referred to in Contention 2 as being relied upon "to define degraded tubes."

(b) State in detail all facts which support TMIA's allegation in Contention 2 that the testing technique identified in the response to Interrogatory 2.4(a) is "inaccurate or inconclusive."

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the testing technique is inaccurate or inconclusive.

Interrogatory 2.5

(a) State in detail all facts which support TMIA's allegation that IGA without "grain dropout" is difficult to detect using ECT. Tr. at 57.

(b) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information relied upon, and explain in detail how this information relates to and supports TMIA's allegation that IGA without "grain dropout" is difficult to detect using ECT.

Interrogatory 2.6

(a) Does TMIA contend that IGA without "grain dropout" cannot be detected if IGA has penetrated to (i) 40% throughwall; (ii) 50% throughwall, (iii) 60% throughwall, (iv) 70% throughwall?

(b) For each affirmative response to the preceding interrogatory, (i) state in detail all facts which support TMIA's allegation that IGA without "grain dropout" cannot be detected at the particular penetration, (ii) identify each document upon which TMIA relies or intends to rely in establishing such facts, (iii) specify the sections and pages containing the

information relied upon, and (iv) explain in detail how such information relates to and supports TMIA's allegation.

Interrogatory 2.7

(a) Explain in detail how and to what extent eddy current testing is allegedly "inaccurate and inconclusive" with respect to "IGA and pitting."

(b) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that eddy current testing is "inaccurate and inconclusive" with respect to IGA and pitting.

Interrogatory 2.8

(a) Does TMIA contend that the alleged inaccuracy and inconclusiveness of eddy current testing means that the plugging limit should not be changed from 40% to 50% throughwall under the conditions proposed by Licensee in Change Request 153?

(b) If the answer to the preceding interrogatory is other than negative, state in detail all facts which support TMIA's allegation that the alleged inaccuracy and inconclusiveness of

eddy current testing means that the plugging limit should not be changed from 40% to 50% throughwall under the conditions proposed by Licensee in Change Request 153.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation.

Interrogatory 2.9

(a) Does TMIA contend that the alleged inaccuracy and inconclusiveness of eddy current testing means that the plugging limit should not be increased from 40% throughwall under the conditions proposed by Licensee in Change Request 148?

(b) If the answer to the preceding interrogatory is other than negative, state in detail all facts which support TMIA's allegation that the alleged inaccuracy and inconclusiveness of eddy current testing means that the plugging limit should not be increased from 40% throughwall under the conditions proposed by Licensee in Change Request 148.

(c) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which

TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation.

Interrogatory 2.10

(a) State in detail all facts which support TMIA's allegation that "grain dropout" from IGA can mask otherwise detectable cracks. Tr. at 57, 58.

(b) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that grain dropout from IGA can mask otherwise detectable cracks.

Interrogatory 2.11

(a) Does TMIA contend that Licensee's response to the NRC's question about masking as set forth at page 12 of Change Request 148 is in any manner deficient or inadequate?

(b) If the answer to the preceding interrogatory is affirmative, (i) explain and state in detail all facts which support TMIA's contention that the response is deficient or

inadequate, (ii) identify each document upon which TMIA relies or intends to rely to establish such facts, (iii) specify the sections and pages containing the information relied upon, and (iv) explain in detail how such information relates to and supports TMIA's allegation that the response is deficient or inadequate.

Interrogatory 2.12

(a) State in detail all facts which support TMIA's allegation that the circumferential length of defects detected using ECT is difficult to accurately determine. Tr. at 47.

(b) For each fact set forth in the response to the preceding interrogatory, identify each document upon which TMIA relies or intends to rely in establishing such facts, specify the sections and pages containing the information relied upon, and explain in detail how such information relates to and supports TMIA's allegation that the circumferential length of defects is difficult to adequately determine.

Interrogatory 2.13

(a) Does TMIA contend that for defects measuring greater than one coil, the 8x1 probe measurement results in an underestimation ("undercall") of circumferential defects? Tr. at 79.

(b) If the answer to the preceding interrogatory is affirmative, (i) state in detail all facts which support TMIA's answer, (ii) identify all documents upon which TMIA relies or intends to rely to establish such facts, (iii) specify the sections and pages containing the information relied upon, and (iv) explain in detail how such information relates to and supports TMIA's response.

Interrogatory 2.14

(a) State in detail all facts which support TMIA's allegation that the determination of throughwall penetration is based on curves, the accuracy of which has been unverified through "metallographical comparisons." Tr. at 57.

(b) Describe in detail all that has been done by Licensee and the NRC to date to verify the accuracy of Licensee's conversion curves, and explain why such efforts are deficient or inadequate.

(c) Describe in detail the type and nature of metallographical comparisons TMIA contends is necessary to adequately verify the throughwall penetration curve.

(d) For each fact set forth in the responses to the preceding three interrogatories, (i) identify each document upon which TMIA relies or intends to rely in establishing such

facts, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that the curves are not adequately verified.

Interrogatory 2.15

(a) State in detail all facts which support TMIA's allegation that ECT cannot distinguish between outside diameter ("OD") and inside diameter ("ID") defects at the same elevation. Tr. at 57.

(b) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that ECT cannot distinguish between outside diameter and inside diameter defects at the same elevation.

Interrogatory 2.16

(a) Does TMIA contend that ECT cannot distinguish between OD and ID defects when such defects are not at the same elevation?

(b) If the answer to the preceding interrogatory is affirmative, (i) state in detail all facts which support TMIA's contention that ECT cannot distinguish between OD and ID defects which are not at the same elevation, (ii) identify each document upon which TMIA relies or intends to rely in establishing such facts, (iii) specify the sections and pages containing the information relied upon, and (iv) explain in detail how such information relates to and supports TMIA's assertion that ECT cannot distinguish between OD and ID defects when not at the same elevation.

Interrogatory 2.17

(a) State in detail the facts supporting TMIA's assertion that "there has been no verification of the determinations of crack configurations through metallurgical comparisons with actual pulled tubes." Tr. at 57.

(b) Identify and describe the "determinations of crack configurations" which TMIA asserts must be verified through comparisons with pulled tubes, and explain why such verification is necessary.

(c) For each of the preceding two interrogatories, (i) identify each document upon which TMIA relies or intends to rely in establishing the facts and assertions set forth, (ii)

specify the sections and pages containing the information relied upon, and (iii) explain in detail how such information relates to and supports such facts and assertions.

Interrogatory 2.18

(a) Does TMIA contend that analysis on pulled tubes is necessary to verify anything other than the curve which Licensee has developed to measure the penetration of ID cracks?

(b) If the answer to the preceding interrogatory is affirmative, (i) describe in detail each process which TMIA contends needs to be verified using pulled tubes, and state in detail the reasons why such verification is necessary, (ii) identify each document upon which TMIA relies or intends to rely in supporting its answer, (iii) specify the sections and pages containing the information relied upon, and (iv) explain in detail how such information relates to and supports TMIA's response.

Contention 5 (Compliance with Reg. Guide 1.121)

Interrogatory 5.1

(a) Describe in detail the facts which support TMIA's allegation that Licensee's proposed plugging criteria under Change Request 148 are inconsistent with Reg. Guide 1.121.

(b) Describe in detail the facts which support TMIA's allegation that Licensee's proposed plugging criteria under Change Request 153 are inconsistent with Reg. Guide 1.121.

(c) For each of the preceding interrogatories, (i) identify each document upon which TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how this information relates to and supports TMIA's allegation that the proposed plugging criteria are inconsistent with Reg. Guide 1.121.

Interrogatory 5.2

(a) Explain in detail the manner in which the inconsistencies identified in TMIA's responses to Interrogatories 5.1(a) and 5.1(b) support TMIA's allegation that neither the Licensee nor the staff have demonstrated that the proposed revised plugging criteria will meet GDC 14, 15 and 31.

(b) In formulating the answer to the preceding interrogatory, identify the particular provisions of GDCs 14, 15 and 31 which are relevant to TMIA's allegation and explain in detail why TMIA contends these particular provisions are not met due to the alleged inconsistencies with Reg. Guide 1.121.

(c) Identify each document upon which TMIA relies or intends to rely in responding to the two preceding interrogatories; specify the sections and pages containing the information relied upon; and explain in detail how this information relates to and supports TMIA's responses.

Interrogatory 5.3

(a) State in detail all facts which support TMIA's allegation that the proposed plugging criteria in Change Request 148 do not "take into account variations in tube thickness due to possible corrosion."

(b) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation.

Interrogatory 5.4

(a) State in detail all facts which support TMIA's allegation that the proposed plugging criteria in Change Request 153 do not "take into account variations in tube thickness due to possible corrosion."

(b) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation.

Interrogatory 5.5

(a) Identify precisely the elements of GDC 14, 15 and 31 which TMIA alleges have not been complied with for Change Request 148 because of the alleged failure to "take into account variations in tube thickness due to possible corrosion."

(b) Explain in detail how the alleged failure to "take into account variations in tube thickness due to possible corrosion" is a failure to comply with each element of GDC 14, 15, and 31 identified in the response to the preceding interrogatory.

(c) State in detail all facts supporting your answer to the preceding interrogatory.

(d) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information

relied upon, and (iii) explain in detail how such information relates to and supports TMIA's allegation that Change Request 148 does not comply with GDC 14, 15, and 31 because of the alleged failure to "take into account variations in tube thickness due to possible corrosion."

Interrogatory 5.6

(a) Identify precisely the elements of GDC 14, 15 and 31 which TMIA alleges have not been complied with for Change Request 153 because of the alleged failure to "take into account variations in tube thickness due to possible corrosion."

(b) Explain in detail how the alleged failure to "take into account variations in tube thickness due to possible corrosion" is a failure to comply with each element of GDC 14, 15 and 31 identified in the response to the preceding interrogatory.

(c) State in detail all facts supporting your answer to the preceding interrogatory.

(d) For each fact set forth in the response to the preceding interrogatory, (i) identify each document upon which TMIA relies or intends to rely in establishing such facts, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how such information

relates to and supports TMIA's allegation that Change Request 153 does not comply with GDC 14, 15, and 31 because of the alleged failure to "take into account variations in tube thickness due to possible corrosion."

Interrogatory 5.7

(a) State in detail all facts which support TMIA's assertion that Licensee acknowledged that there would be "regulatory degradation" of the tubes once the plant is in operation. Tr. at 95.

(b) Explain in detail what TMIA believes constitutes "regulatory degradation".

(c) For the preceding two interrogatories, (i) identify each document upon which TMIA relies or intends to rely in establishing its position, (ii) specify the sections and pages containing the information relied upon, and (iii) explain in detail how this information relates to and supports TMIA's assertions.

IV. Request for Production of Documents

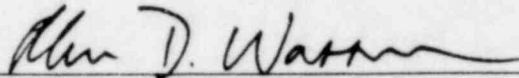
Licensee requests that TMIA respond in writing to the following request for production of documents and produce or make available for inspection and copying at a designated location each of the documents that are requested below.

1. Licensee requests that TMIA produce each and every document identified or described in the answer to any specific interrogatory above.

2. Licensee requests that TMIA produce each and every document that TMIA used or referred to in preparing the response to any of the interrogatories above.

3. Licensee requests that TMIA produce all correspondence between TMIA and anyone else concerning any of the admitted contentions.

Respectfully submitted,



Bruce W. Churchill, P.C.
Alan D. Wasserman
Wilbert Washington II

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Counsel for Licensee

Date: April 4, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Atomic Safety and Licensing Board

'86 APR -7 P12:12

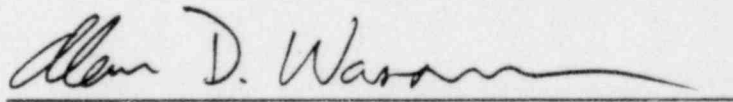
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DOCKETING & SERVICE
BRANCH

In the Matter of)
)
GPU NUCLEAR CORPORATION, et al.)
)
(Three Mile Island Nuclear Station,))
Unit No. 1))

Docket Nos. 50-289-OLA-1 and
50-289-OLA-2

CERTIFICATE OF SERVICE

This is to certify that copies of "Licensee's First Set of Interrogatories and Request for Production of Documents" were served by deposit in the United States Mail, first class, postage prepaid, to all those on the attached Service List, except that those marked with an asterisk were served by hand delivery, on the 4th day of April, 1986.



Alan D. Wasserman

Dated: April 3, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
GPU NUCLEAR CORPORATION, et al.) Docket Nos. 50-289-OLA-1 and
) 50-289-OLA-2
(Three Mile Island Nuclear Station,))
Unit No. 1))

SERVICE LIST

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