



September 13, 1979

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-289
)	
(Three Mile Island Nuclear)	
Station, Unit No. 1))	

LICENSEE'S ANSWER TO PETITION TO INTERVENE
BY STEVEN C. SHOLLY

On August 20, 1979, Steven C. Sholly (Petitioner) filed with the Secretary of the Nuclear Regulatory Commission a petition to intervene in this proceeding. This petition was followed by a supplemental and amended petition dated September 4, 1979. Copies of both documents were received simultaneously by counsel for Metropolitan Edison Company (Licensee) from the NRC Docketing and Service Section on September 12, 1979. In accordance with the Board's Memorandum and Order, dated August 31, 1979, Licensee's answer is confined to the adequacy of the petition from the standpoint of Petitioner's showing of interest and identification of the aspect or aspects of the proceeding as to which intervention is sought. Petitioner's contentions, which are included in the petition, will be addressed at a subsequent time.

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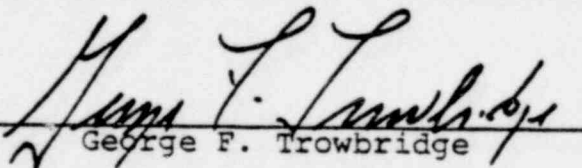
Petitioner apparently seeks intervention pursuant to Section 2.714 of the Rules of Practice "as a full participant by means of intervention" rather than a limited appearance pursuant to Section 2.715.

Licensee's position is that the petition adequately sets forth Petitioner's interest in the proceeding. Petitioner has not expressly responded to the requirement in the Commission Order and Notice of Hearing dated August 9, 1979, and in Section 2.714(a)(2) of the Rules of Practice that the petition set forth the specific aspect or aspects of the proceeding in which he desires to intervene. Petitioner has, however, included in his petition a lengthy set of contentions. While some of these are clearly outside the scope of the proceeding, others adequately identify aspects of the proceeding in which Petitioner is entitled to intervene. Therefore, Licensee has no objection to the petition on grounds of interest or identification of aspects in which Petitioner wishes to intervene.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By


George F. Trowbridge

Dated: September 13, 1979

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Answer to Petition to Intervene by ~~Steven C. Sholly~~," dated September 13, 1979, were served upon the following persons by deposit in the United States mail, postage prepaid, this 13th day of September, 1979.

Ivan W. Smith, Esquire
Chairman
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

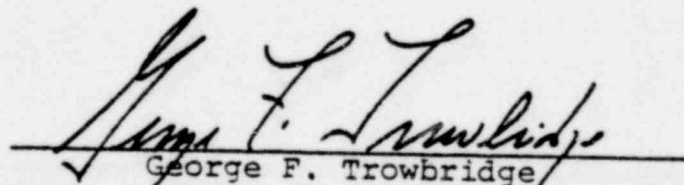
Dr. Walter H. Jordan
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Office of Executive Legal Director
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Washington, D.C. 20555

Docketing and Service Section (21)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555


George F. Trowbridge

Dated: September 13, 1979

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