

September 18, 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 MARJORIE M. AAMODT

By letter dated September 12, 1979, addressed to the Secretary of the Commission, Marjorie M. Aamodt (Petitioner) has submitted a petition to intervene in this proceeding. A copy of the petition was received by Licensee's counsel from the Docketing and Service Section on September 17, 1979.

Petitioner expresses a preference for attendance as a full intervenor but would, alternatively, attend on a limited appearance basis.

Petitioner has not identified a specific interest in the proceeding. To the extent that interest may be based on proximity to Three Mile Island, such interest at a distance of 45-50 miles from the plant is at best marginal. Further, Petitioner has not set forth the specific aspects of the proceeding in which she wishes to intervene. With respect to issues of cost raised by the petition, these are outside the scope of the proceeding. With respect to Petitioner's enumerated safety

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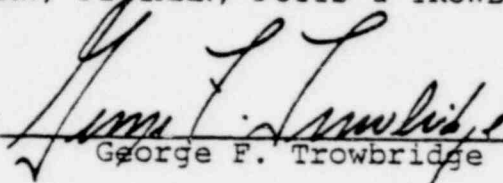
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concerns, none are specifically tied to the hearing issues specified by the Commission in its Order and Notice of Hearing dated August 9, 1979. Accordingly, Licensee proposes that the petition to intervene not be granted but that Petitioner be granted locus as a limited appearance.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By


George F. Trowbridge

Dated: September 18, 1979

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Answer to Petition to Intervene by Marjorie M. Aamodt," dated September 18, 1979, were served upon the following persons by deposit in the United States mail, postage prepaid, this 18th day of September, 1979.

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

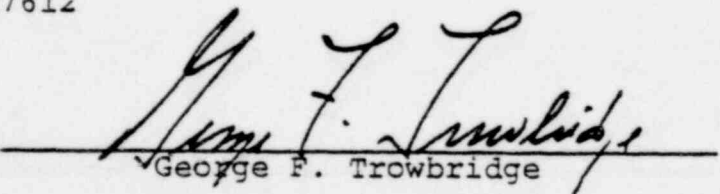
Dr. Walter H. Jordan
Atomic Safety and Licensing
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Dr. Linda W. Little
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5000 Hermitage Drive
Raleigh, North Carolina 27612

Ms. Marjorie M. Aamodt
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James A. Tourtellotte, Esquire (4)
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
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 18, 1979

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