

September 17, 1979

NRC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

Docket No. 50-289

LICENSEE'S ANSWER TO PETITION FOR LEAVE TO INTERVENE
BY THREE MILE ISLAND ALERT, INCORPORATED

Metropolitan Edison Company (Licensee) hereby submits its answer to an undated Petition for Leave to Intervene by Three Mile Island Alert, Incorporated (Petitioner). The certificate of service attached to the petition indicates that the petition was mailed to undersigned counsel on September 12, 1979, and a copy of the petition was received by undersigned counsel on September 14, 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.

Licensee's position is that the petition adequately sets forth Petitioner's interest in the proceeding and the specific aspect or aspects of the subject matter of the proceeding in which it wishes to intervene. Counsel for Licensee is advised that Kathy McCaughin, who signed the petition as Authorized

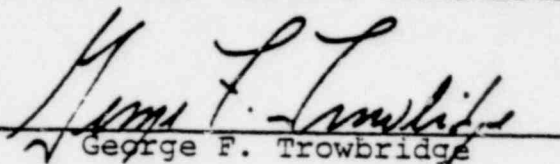
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Representative of Three Mile Island Alert, Inc., is a member of that organization and resides within 20 miles of Three Mile Island. Thus the petition on its face identifies by name one individual member with an interest in the proceeding who has implicitly authorized Petitioner to represent that interest in the proceeding.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By 
George F. Trowbridge

Dated: September 17, 1979

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Answer to Petition for Leave to Intervene by Three Mile Island Alert, Incorporated," dated September 17, 1979, were served upon the following persons by deposit in the United States mail, postage prepaid, this 17th day of September, 1979.

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

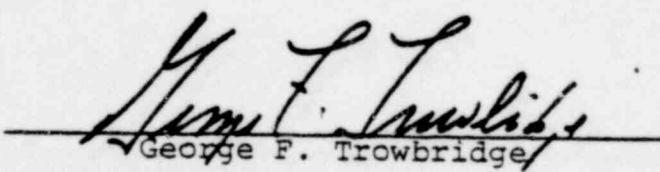
Dr. Walter H. Jordan
Atomic Safety and Licensing
Board Panel
881 West Outer Drive
Oak Ridge, Tennessee 37830

Dr. Linda W. Little
Atomic Safety and Licensing
Board Panel
5000 Hermitage Drive
Raleigh, North Carolina 27612

Kathy McCaughin
Authorized Representative for
Three Mile Island Alert, Inc.
23 South 21st Street
Harrisburg, Pennsylvania 17104

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 17, 1979

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