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October 15, 1979

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

Dear Mr. Chairman and Members of the Board:

This is to advise the Board that Licensee, unless otherwise requested by the Board, does not intend to file any response to the following motions filed in this proceeding by ANGRY and TMI Alert:

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1. Anti-Nuclear Group Representing York (A.N.G.R.Y.) Motion for Certification to the Commission of Issues Regarding Intervenor Compensation, Clarification of Matters to be Considered, and for Relief from Requirements of 10 CFR 2.708(d), dated October 5, 1979.
2. Motion to Modify Memorandum and Order Setting Special Prehearing Conference, dated October 10, 1979. (Requesting scheduling changes.)
3. Motion to Modify Memorandum and Order Setting Special Prehearing Conference, dated October 10, 1979. (Requesting deletion of requirement of plan for the presentation of psychological distress evidence and a discussion of the state of the art of stress psychology.)

With respect to the ANGRY motion, Licensee has already stated its views on the first question of financial assistance to intervenors on issues other than psychological distress. See Licensee's Answer to Motion to Modify Memorandum and Order Setting Special Prehearing Conference, and Supplements Thereto, by Chesapeake Energy Alliance, Inc., dated October 10, 1979. With respect to ANGRY's second request to clarify the parameters of the proceeding, the motion fails to state a position on the scope of the proceeding to which response is possible. In any event, the scope of the proceeding has already been established by the Commission's Order and Notice of Hearing, dated August 9, 1979. As to ANGRY's third request, Licensee considers ANGRY's request for relief from the numerical filing requirements of 10 CFR 2.708(d) (presumably the number of copies to be filed with the Office of the Secretary) to be a matter entirely within the discretion of the Board.

With respect to the two motions filed by TMI Alert, we note at the outset that they were not filed within the five-day period prescribed by the Board's Memorandum and Order, dated

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September 21, 1979. More importantly, the motions merely repeat in substance motions previously filed by CEA and PANE to which Licensee has already responded.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By Ernest L. Blake, Jr.
Ernest L. Blake, Jr.

cc: Attached Service List

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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

SERVICE LIST

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