

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD



In the Matter of
METROPOLITAN EDISON COMPANY
(Three Mile Island Nuclear
Station, Unit 1)

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)
) Docket No. 50-289
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TMIA'S MOTION FOR PRODUCTION OF DOCUMENTS

1. On April 18, 1983 TMIA filed its comments on the Babcock and Wilcox - GPU trial transcripts.
2. It was not until April 22, 1983, that the complete transcripts and exhibits were available to TMIA after being placed at the State Library in Harrisburg.
3. The transcripts and exhibits are so voluminous that a review thereof has been impossible, especially since 67 feet of unentered exhibits were not available until April 26, 1983.
4. The NRC staff acknowledged in its March 28, 1983 memorandum to the Commissioners that it "did not examine these supplemental documents".
5. TMIA believes and therefore alleges that these documents contain significant factual information that is critical to the primary objective, i.e., whether there is information from the trial that affects the TMI-1 restart.

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6. TMIA is unable to comment fully on the trial because there was not been enough time to review all documents prior to April 18, 1983 and especially because its access to the documents is/^{now}severely limited.

7. The severe limitations are the result of the State Library policy not to allow the removal of any documents from its premises. Additionally, the hours of operation of the Library being only 9 o'clock a.m. to 5 o'clock p.m. on weekdays restricts TMIA membership from full access.

8. The State Library has indicated it will permit the temporary removal of documents on an overnight basis if so ordered by this Commission.

9. TMIA would request this Commission to allow the removal of documents by TMIA from 3:30 p.m. to 9:00 a.m. the following working day.

10. TMIA's request will allow it to make a thorough review of the trial documents, which the NRC staff refused to do, with minimal adverse impact to the public, and will also promote the analysis and review previously ordered by the Commission.


11. Alternatively, TMIA requests that it be provided with a complete copy of the transcripts and documents including the total number of exhibits developed during the trial and including those not admitted into evidence.

12. No prejudice to any of the parties will result from the granting of this motion.

Wherefore, TMIA respectfully requests the NRC to enter an Order extending its time to comment on the Babcock and Wilcox - GPU trial record and to either Order the State Library to permit the removal of documents on an overnight basis or provide TMIA with a complete copy to permit a reasonable review of these proceedings.

Respectfully submitted,

May 3, 1983



Louise Bradford
Joanne Doroshow
TMIA

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(Three Mile Island Nuclear Station,)
Unit No. 1))

Docket No. 50-289
(Restart)

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