

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

84 JAN -4 P12:58

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

Docket No. 50-289  
(Steam Generator Repair)

OFFICE OF SECRETARY  
REGULATORY & SERVICE

TMIA RESPONSE TO LICENSEE REQUEST FOR PRODUCTION OF DOCUMENTS

Except in those few instances where otherwise noted, the answers to the attached interrogatories are based on Licensee and NRC documents which concern the subject steam generator tubes failures and repairs. Since all Licensee documents are already in the possession of the Licensee, and all NRC documents are likely in Licensee's possession, or if not, can be located in the public document room, it would be unnecessary, burdensome, and improper to require TMIA to attempt to produce these documents, and for all contentions other than TMIA Contention 1.b, for which documents are supplied, TMIA objects to this request for documents.

As to the McGraw-Hill Dictionary of Scientific and Technical Terms and Knott's The Fundamentals of Fracture Mechanic, referred to in response to Interrogatories relating to Contentions 1.d and 2.c, TMIA is not in possession of these documents.

Respectfully submitted,

By:

Joanne Doroshow  
Louise Bradford  
TMI Alert

January 3, 1984

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PDR ADOCK 05000289  
G PDR

DOCUMENTS SUPPLIED  
IN RESPONSE TO  
REQUEST FOR PRODUCTION OF DOCUMENTS

The following documents are supplied to Licensee:

September 19, 1982 memo to Ray Fraley from Paul Shewman; Re:  
SBLOCA by SG Tube Rupture in TMI-1

September 30, 1982 memo to D. Moeller from Richard Major; Re: MEMO  
SHEWMON TO FRALEY DATED SEPTEMBER 19, 1982, RE: SBLOCA BY  
SG TUBE RUPTURE IN TMI-1.

March 23, 1983 letter from Chairman Edward J. Markey to Honorable  
Nunzio Palladino.

February 18, 1982 POLICY ISSUE, SECY-82-72, to The Commissioners  
from William Dirks; Re: OVERALL STEAM GENERATOR PROGRAM.

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Docket No. 50-289  
(Steam Generator Repair)

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

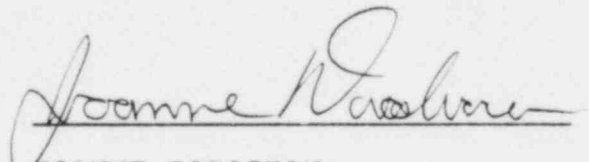
AFFIDAVIT OF JOANNE DOROSHOW

I, Joanne Doroshow, being first duly sworn, deposes and says  
that:

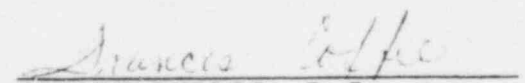
1. I am one of two volunteer members of Three Mile Island Alert,  
Inc., who represent that organization as an intervening party in the  
above-captioned action.

2. I have read the foregoing responses to interrogatories, and  
the same are true to the best of my knowledge.

DATED: January <sup>4</sup>3, 1984

  
JOANNE DOROSHOW

Sworn and subscribed before me on this 4<sup>th</sup> day of January, 1984.

  
NOTARY PUBLIC, D.C.

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Docket No. 50-289

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BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of the attached TMIA RESPONSE  
TO LICENSEE INTERROGATORIES AND TMIA RESPONSE TO REQUEST  
FOR PRODUCTION OF DOCUMENTS, dated January 3, 1984, were  
served this 4th day of January, 1984, by deposit in the U.S.  
Mail, first class, postage prepaid, or hand delivered, to  
those on the attached service list.

JOANNE DOROSHOW

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY, <u>ET AL.</u>	)	Docket No. 50-289-OLA
	)	ASLBP 83-491-04-OLA
(Three Mile Island Nuclear	)	(Steam Generator Repair)
Station, Unit No. 1)	)	

SERVICE LIST

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