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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
JUL 11 1984

In the Matter of

METROPOLITAN EDISON COMPANY )

(NRC Docket No. 50-289 OLA)

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

ASLBP Docket No. 83-491-04-OLA  
(Steam Generator Repair)

COMMONWEALTH OF PENNSYLVANIA'S MOTION FOR LEAVE TO  
PARTICIPATE AS AN INTERESTED STATE PURSUANT  
TO 10 C.F.R. §2.715(c)

The Commonwealth of Pennsylvania hereby requests leave to participate in the hearings scheduled in the above-captioned proceeding as an interested State, pursuant to 10 C.F.R. §2.715(c), for the following reasons:

1. By order dated June 1, 1984, the Atomic Safety and Licensing Board, in response to motion for summary disposition, dismissed certain contentions raised by Joint Intervenor in the proceeding. The Board, however, did not dispose of Contentions 1.a and 1.b in full, and scheduled a hearing on the remaining parts of these contentions commencing July 16, 1984.

2. The Commonwealth of Pennsylvania has an interest in participating at the hearing to ensure that the facts are fairly presented and that the evidence is thoroughly analyzed.

3. The Commonwealth of Pennsylvania, through its nuclear engineering staff, has the technical expertise to evaluate the testimony and evidence which will be presented. The staff is prepared to examine the issues raised by the contentions.

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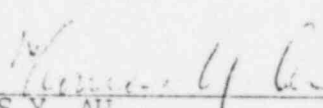
4. The Commonwealth of Pennsylvania does not intend to submit direct testimony or to introduce witnesses at this hearing. Its participation will be limited to cross-examination of witnesses and the filing of proposed findings and exceptions, if necessary.

5. The participation of the Commonwealth of Pennsylvania will not cause delay or confusion and will not complicate this proceeding.

For these reasons, the Commonwealth of Pennsylvania requests leave to participate in the hearing as an interested State.

Respectfully submitted,

FOR THE COMMONWEALTH OF PENNSYLVANIA

  
\_\_\_\_\_  
THOMAS Y. AU  
Assistant Counsel

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(717) 787-7060

Dated: July 9, 1984

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NUCLEAR REGULATORY COMMISSION

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BRANCH

NOTICE OF APPEARANCE

Please note that the undersigned enters an appearance on behalf of the Commonwealth of Pennsylvania in the above-captioned matter. In accordance with 10 C.F.R. §2.713(b), the following information is provided:

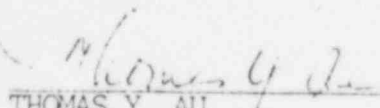
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ADMISSIONS: Supreme Court of the United States  
Supreme Court of Pennsylvania  
Supreme Court of the State of California  
District of Columbia Court of Appeals  
United States Courts of Appeals for the  
District of Columbia Circuit, the Third  
Circuit and the Sixth Circuit  
United States District Courts for  
Northern District of California and Western  
District of Pennsylvania

NAME OF PARTY: Commonwealth of Pennsylvania

  
THOMAS Y. AU  
Assistant Counsel  
Department of Environmental Resources

Date; July 9, 1984

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OFFICE OF THE  
SECRETARY  
BRANCH

CERTIFICATE OF SERVICE

On this            day of July, 1984, I certify that copies of the Commonwealth of Pennsylvania's Motion for Leave to Participate as an Interested State Pursuant to 10 C.F.R. §2.715(c), are being sent to the persons on the attached Service List by first class mail, postage prepaid.

*Thomas Y. Au*  
\_\_\_\_\_  
THOMAS Y. AU  
Assistant Counsel

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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