

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

CEA:DIS:NRC-80.02.25

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

METROPOLITAN EDISON COMPANY)

(Three Mile Island, Unit 1))

Docket No. 50-289
(Restart?)

CEA SECOND SUPPLEMENT TO ITS INTERROGATORIES TO NRC STAFF

Intervenor Chesapeake Energy Alliance (CEA), hereby submits this supplement to its First Set of Interrogatories to NRC Staff (CEA:DIS:NRC-80.02.13) as follows:

Definition CEA hereby incorporates the definition of 'probability' that is described in CEA:DIS:LIC-80.02.25, at 8, and requests that NRC apply this definition whenever it furnishes a probability estimate to CEA as part of its answer, (including its answers to the interrogatories in CEA:DIS:NRC-80.02.13)

Interrogatory

12-16

Answer the interrogatory posed to Licensee (LIC) as 12-14 in CEA:DIS:LIC at 6- except that whenever 12-14 (LIC) refers to 'LIC', 'NRC' shall be substituted.

Document Requests

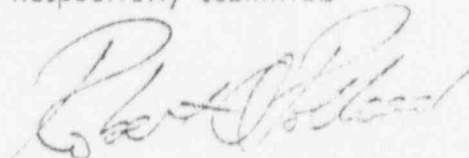
CEA hereby requests that NRC furnish the following documents to CEA, and states that these documents are necessary for CEA to prepare fully for the trial of CEA's contentions:

- 1) Regulatory Guides: 1.58, 1.97, 1.8, 1.134, 1.23, 1.145, 4.15 4.2, & 4.1.
- 2) WASH 1400.

Corrections

CEA's first supplement to its interrogatories to NRC was mislabelled as CEA:DIS:LIC-80.02.13a, and should have been CEA:DIS:NRC-80.02.13a. A numbering error resulted in two interrogatories labelled as 12-11; the second of these (to avoid excessive re-numbering) is to be re-labelled 12-11(a)

Respectfully submitted



Robert Q. Pollard, for
CHESAPEAKE ENERGY ALLIANCE, INC.

Dated: February 25, 1980

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NUCLEAR REGULATORY COMMISSION

CEA:DIS:LIC-80.02.25
& CEA:DIS:NRC-80.02.25

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

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CERTIFICATE OF SERVICE

I do hereby certify that I served a true and correct copy of the above-labelled documents on the below-listed parties by first-class mailing:

Ivan W. Smith, Esquire
Atomic Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Walter H. Jordan
881 West Outer Drive
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Docketing and Service Section
U.S. Nuclear Regulatory Commission
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U.S. Nuclear Regulatory Commission
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RELATED CORRESPONDENCE



Respectfully submitted,

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February 25, 1980