IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WESTINGHOUSE ELECTRIC COMPANY,)
Plaintiff,) CIVIL ACTION NO. 00-CV-895) Judge Gary L. Lancaster
v.)
UNITED STATES OF AMERICA, UNITED STATES DEPARTMENT OF ENERGY, and NUCLEAR REGULATORY COMMISSION,)))
Defendants.)

FEDERAL DEFENDANTS' INITIAL DISCLOSURES

Federal Defendants United States of America, United States Department of Energy ("DOE"), and United States Nuclear Regulatory Commission ("NRC"), by and through their attorney, Steven E. Rusak, Trial Attorney, United States Department of Justice, submit their initial disclosures pursuant to Federal Rule of Civil Procedure Rule 26(a)(1).

1. List the name and, if known, the last address and telephone number of each individual, other than the Defendant, likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information.

RESPONSE:

Federal Defendants believe that the following person has relevant information:

Joseph C. Szurley, Senior Technologist Bechtel Bettis, Inc. Bettis Atomic Power Laboratory P.O. Box 79 West Mifflin, PA 12122-0079 Tel: (412) 476-6696

Mr. Szurley was employed at the Bettis Atomic Power Laboratory and is believed to have personal knowledge regarding a purchase order that Bettis placed with the Blairsville Facility in

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or about 1956, involving the manufacture of fuel elements using natural uranium. It is believed that Mr. Szurley made several visits to the Blairsville Facility to observe work being performed under the Bettis purchase order.

2. Give a copy of, or a description by category and location of, all documents, data compilations, and tangible things in your client's possession, custody or control that are relevant to disputed facts alleged with particularity in the pleadings.

RESPONSE:

Federal Defendants previously produced documents numbered US001 through US579 to Plaintiff.

3. The existence and contents of any insurance agreement under which any person or entity carrying on an insurance business may be liable to satisfy part or all of the judgment that may be entered in the action, making available such agreement for inspection and copying.

RESPONSE: Not applicable, the United States is self-insured.

Wherefore, the Federal Defendants submit their initial disclosures.

Respectfully submitted,

JOHN C. CRUDEN

Acting Assistant Attorney General

Environment & Natural Resources Division

STEVEN E. RUSAK, Senior Attorney

United States Department of Justice

Environment & Natural Resources Div.

Environmental Defense Section

P.O. Box 23986

Washington, D.C. 20026-3986

Tel: (202) 514-9275

HARRY LITMAN United States Attorney Western District of Pennsylvania

JESSICA LIEBER SMOLAR, PA Bar # 65406 Assistant United States Attorney Western District of Pennsylvania 633 U.S. Post Office and Court House Pittsburgh, Pennsylvania 15219 Tel: (412) 644-3500

OF COUNSEL:

JAMES CAREY, Chief Counsel Pittsburgh Naval Reactors Office United States Department of Energy P.O. Box 109 West Mifflin, PA 15122-0109 Tel: (412) 476-7202

CHARLES MULLINS, Senior Attorney Office of the General Counsel United States Nuclear Regulatory Commission Washington, D.C. 20555 Tel: (301) 415-1606

DATE: November 19, 2001

CERTIFICATE OF SERVICE

I, Steven E. Rusak, do hereby certify that the foregoing "Federal Defendants' Initial Disclosures," were served by placing a true and correct copy in the United States mail, postage prepaid, and addressed to the following:

Steven Baicker-McKee, Esq. Scott A. Wright, Esq. Babst, Calland, Clements & Zomnir, P.C. Two Gateway Center, 8th Floor Pittsburgh, PA 15222

on this 19th day of November, 2001.

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