

July 29, 2002

Charles A. Patrizia, Esq.
Paul, Hastings, Janofsky & Walker LLP
1299 Pennsylvania Avenue NW
Washington, DC 20004-2400

Re: Stevens et al. v. Verizon Communications Inc., No. 02 CV 2543 (EDNY); Schwinger et al. v. Verizon Communications Inc., No. 02 CV 2017 (EDNY); Demand for Indemnity-- Further Contract Information

Dear Mr. Patrizia

We are in receipt of your July 19, 2002 letter to General Counsel Karen D. Cyr in which you have included some additional information that you have obtained from the Atlanta Federal Records. In addition your letter requested our assistance in obtaining the necessary clearances that counsel and appropriate staff of your client may obtain access to those documents which remain classified. You also noted that you were sending a similar letter to the General Counsel of the Department of Energy.

We have reviewed the materials which you provided and none suggests to us any likelihood that the Nuclear Regulatory Commission would have been the successor agency for the activities involved. We believe therefore that your request for assistance was correctly addressed to the Department of Energy rather than to the Commission. We would not have the authority to declassify materials related to Oak Ridge Operations, weapons activities and the like, nor would we be able to secure security clearances for non-NRC staff to be able to review classified information within the purview of DOE.

We regret that we can be of no further assistance to you with your current requests. Should you wish to contact us further with regard to this litigation, it might be more expeditious were you to correspond with me directly.

Sincerely,

/RA/

John F. Cordes, Jr.
Solicitor