



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

August 24, 1979

NOTE TO: Group 1

F. Hebdon
W. Lanning
D. Evans
✓ T. Cox
H. Ornstein
L. Vandenberg

SUBJECT: SIGNIFICANT POINTS MADE AT GROUP LEADERS' MEETING ON AUGUST 24, 1979

1. For depositions:

- a. A master calendar of witnesses scheduled for interviews will be displayed in Bay 1 (front office).
- b. When a deposition proceeding has covered your line of questions, be sure to ask whether there is anything else that the witness wants to say; whether we have failed to elicit information in areas believed to be important, whether the testimony is complete in all areas, etc.
- c. Before the deposition and in preparing for the deposition, inform the witness of the areas to be covered; get from the witness all pertinent prior statements and background documents.
- d. Front office may put out further guidance for the "opening" and "closing" of depositions.
- e. If subject matter involves anything of significance for our work and the SIG report, we should go the deposition route. This is particularly true with regard to NRC people where we must maintain an arm's length relationship (i.e., avoid falling into the trap of being too close).

2. We may want to expedite our interviews of those Met Ed-GPU people involved in matters of interest to Essex. Meeting will be held here Monday with Essex to discuss this.
3. The question was asked how we are doing on document requests. I replied that I was not aware of any significant problem. Before the end of this month, Mr. Rogovin wants us to go over our prior requests for documents and identify: nonresponses; inadequate responses; evasive responses. He then envisions sending an appropriately-drawn subpoena.

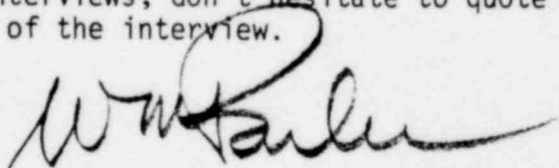
Please get your input to me on this by the end of business on August 28, 1979.

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4. A document request has gone out to Burns & Roe for certain as built drawings.

If we have anything we need from Burns & Roe, let me know promptly so that I can inform George.

5. I understand that Ron Williams (Met Ed or GPU) deposition by the President's Commission contains useful information on Burns & Roe's role in control room design.
6. If you have any new witnesses, let either Dave Evans or me know so that we can keep our witness books current.
7. Need to know what people on George Frampton's list of Met Ed, GPU people we need to depose. I think this has been done, but we should check this again.
3. For interviews (such as over telephone) which are for the purpose of eliciting substantive information (other than chats with NRC people or others for leads) we need to inform the people being interviewed of witness notification. Also for these interviews:
 - a. Have the interview as self-contained as possible. Identify person's name, address, telephone number, position, and the issue involved in the interview.
 - b. Be certain that the substantive points are completely covered.
 - c. If it becomes apparent that the person has information which should be of interest to other groups, inform the person that there may be contacts by others in the SIG. In such event, inform the Group Leaders concerned of the possible source of information pertinent to their tasks.
 - d. Also in writeup of telephone interviews, don't hesitate to quote so as not to detract from the flavor of the interview.



William Parler, Task Leader, Group 1