## BEB SEVENTEENTH STREET, N.W. MAYER, BROWN & PLATT WASHINGTON D C 20006 202-785-4443 231 SOUTH LASALLE STREET 277 PARK AVENUE NEW YORK NEW YORK 10017 CHICAGO, ILLINOIS 60604 212 - 935 - 710 TELEX 253760 CABLE LEMAY 162 OUFEN VICTORIA STREET LONDON ECAY ALS ENGLAND 312.782.0600 01-248-1465 July 18, 1980 DOCKETED USNRC JUL 2 1 1980 D

Ms. Susan N. Sekuler Assistant Attorney General Environmental Control Division 188 West Randolph Street Suite 2315 Chicago, Illinois 60601

> Re: General Electric Company Morris Operation --Docket No. 70-1308

Dear Susan:

This will confirm the understandings reached during our telephone conversation earlier this morning. During that conversation, we discussed the eight notices of deposition of General Electric personnel served by your office and also the interrogatories and document production requests directed to General Electric.

Pursuant to our discussion, General Electric will respond to all interrogatories and document production requests, to which it does not object, on August 4, 1980. Within seven days, following your review of the materials provided to you by General Electric, we will discuss which of the General Electric personnel noticed for deposition by you, you actually seek to depose and the dates therefor. You have reserved your rights to seek the deposition of all General Electric personnel previously noticed by you. We have reserved our rights to object to the deposition of any such individual who, in our judgment, is not a proper deponent. We represent to you that we will not object, on a wholesale basis, to all of your notices of deposition, to your interrogatories or to your document requests.

I trust that this accurately sets forthour understanding.

Thank you very much for your cooperation in this matter.

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Very truly yours, Ronald W. Szwajkowski

Office of the Secretary

Docketing & Service

Branch

RWS:sn cc: As per attached Service List

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION



In the Matter of

GENERAL ELECTRIC COMPANY

Docket No. 70-1308

Consideration of Renewal of Materials License No. SNM-1265 Issued to GE Morris Operation Fuel Storage Installation

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served a copy of the foregoing letter to Susan N. Sekuler, dated July 18, 1980, in the above-captioned proceeding on the following persons by causing the said copies to be deposited in the United States mail at 231 South LaSalle Street, Chicago, Illinois, in plainly addressed and sealed envelopes with proper first class postage attached before 5:00 P.M. on July 18, 1980:

Andrew C. Goodhope, Esq., Chairman Atomic Safety and Licensing Board 3320 Estelle Terrace Wheaton, Maryland 20906

Dr. Linda W. Little Atomic Safety and Licensing Board 5000 Hermitage Drive Raleigh, North Carolina 27612

Dr. Forrest J. Remick Atomic Safety and Licensing Board 305 East Hamilton Avenue State College, Pennsylvania 16801

Atomic Safety and Licensing Appeal Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Bridget L. Rorem Essex, Illinois 60935

Everett J. Quigley R.R. 1, Box 378 Kankakee, Illinois 60901 Susan N. Sekuler, Esg. George William Wolff, Esg. Office of the Attorney General 188 West Randolph Street Suite 2315 Chicago, Illinois 60601

Marjorie Ulman Rothschild, Esq. United States Nuclear Regulatory Commission Washington, D.C. 20555

Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Docketing and Service Section Office of the Secretary U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Ronald W. Szwajkowski