

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of :
: METROPOLITAN-EDISON COMPANY, : DOCKET No. 50-289 (Restart)
(Three-Mile Island Nuclear :
Generating Station, :
Unit No. 1) :

NOTICE OF DEPOSITION

TO: Randy L. Curry, Director
York County Emergency Management Agency

FROM: Daniel M. Pell, Esquire
Attorney for Anti-Nuclear Group Representing York

DATE: August 19, 1980

You are notified that you will be expected to appear to give a deposition concerning the above matter on August 26, 1980, at 9 a.m. at the law office of Daniel M. Pell, Esquire, located at 32 South Beaver Street, York, Pennsylvania.

You will be required to testify concerning your knowledge, if any, of the emergency planning and preparedness of York County with reference to matters now pending before the Atomic Safety and Licensing Board of the Nuclear Regulatory Commission.

Specifically, you will be asked to give testimony concerning York County's emergency plan, its interrelationship with the plan of the Commonwealth of Pennsylvania and also what York County has done with regard to coordination of its plan with local municipalities and townships.

You are required to bring with you a log of the test exercise in which York County participated in July, 1980. Your failure to appear and/or to bring any requested documents may result in the issuance of a subpoena duces tecum to compel your attendance and the production of said documents.

Daniel M. Pell
Attorney for A.N.G.R.Y.

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LAW OFFICES OF

DANIEL M. PELL



32 SOUTH BEAVER STREET
YORK, PENNSYLVANIA 17401
(717) 845-6291

55 NORTH MAIN STREET
DOVER, PENNSYLVANIA 17315
(717) 292-5303

August 19, 1980

Mr. Randy L. Curry, Director
York County Emergency
Management Agency
York County Court House
28 East Market Street
York, Pennsylvania 17401

Dear Mr. Curry:

Pursuant to our telephone conversation of this date, I hereby serve upon you a Notice of Deposition to appear in my law office on Tuesday, August 26, 1980, at 9 a.m. at 32 South Beaver Street, York, Pennsylvania.

As you will note in the Notice of Deposition, the purpose of this proceeding is to inquire into York County's emergency planning and preparedness. You are requested to bring with you at this time a log of the July, 1980 test exercise conducted by the Metropolitan-Edison Company, PEMA and York County in conjunction with the directive of the Nuclear Regulatory Commission.

You indicated you feel you do not have to produce the log of the test exercise. I indicated that I will give you this Notice of Deposition. Should you fail to appear and/or fail to appear with the text of the log you kept in the exercise, I would apply to the Atomic Safety and Licensing Board Chairman, Ivan W. Smith, Esquire, for a subpoena duces tecum to compel you to attend and to produce the log of the test exercise.

If you do not intend to appear on August 26, 1980, please promptly notify me so that I may save much time and expense.

Very truly yours,

Daniel M. Pell

DMP:ksw
Enclosure
pc: Ms. Gail Bradford
Legal Coordinator, A.N.G.R.Y.