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May 28, 1982

Barbara A. Finamore, Esq.
Natural Resources Defense Council
1725 Eye Street, N. W., Suite 600
Washington, D. C. 20006

Dear Barbara:

This is to confirm our discussions of this week regarding discovery in the CRBRP proceedings. In particular, I would note the following:

1. NRDC will file all of its written follow-up discovery to the Applicants on June 4.
2. Dr. Cochran will be available on June 14 for his deposition by the Applicants. We will need one day only. We will furnish the reporter and would like to commence at 9:00 a.m. in my office. I presume that we can waive formal notice for this and NRDC's June 16th deposition.
3. Pursuant to our conversations on May 18th, 25th, and 27th, you will advise me as to when Dr. Cochran wishes to inspect the documents in Oak Ridge for Set 18, I, 19-20 and VI, 23-25.
4. The Applicants will make their witnesses, to the extent identified, available for a deposition, on June 16 in Dave Goesser's Westinghouse Bethesda office (7910 Woodmont Ave.). I understand that you will need one day only. You will furnish the reporter and set the starting time. We will waive formal notice but not signature. We have identified the major or lead people in each contention subject. We reserve the right to add people for the deposition and/or for testimony, and will update our discovery responses as additional experts may be identified. The attached list identifies the people by subject area. They will bring statements of professional qualifications with them to the deposition. I would like to have a schedule from you as to the order of subjects, so that we can schedule travel and minimize people sitting around idly. We will make them available for questions in particular subject areas, and dismiss them when questioning in their respective areas is completed. At this time we have one person with a

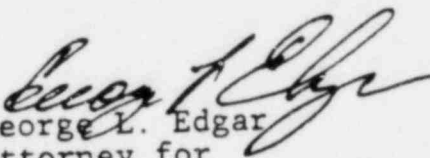
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particular travel and schedule constraint. Dr. McClellan must leave Bethesda by 1:30 p.m. on the 16th; and for that reason, we would like to schedule questioning in the health effects area during the morning. Mr. Anderson will be out of the country, and we are willing to make him available at some later time if you wish.

Please advise if you have any questions concerning the foregoing.

Very truly yours,


George L. Edgar
Attorney for
Project Management Corporation

cc (w/attachment): Service List

ATTACHMENT

Contentions 1, 2, 3

George Clare
Neil Brown

Contention 4

Ed Penico
Arthur Katz

Contentions 5 and 7 (site)

L. J. Kripps
W. Hibbett

Contention 6

George Sherwood
Doug Hornstra
Bob Hartman
Mildred B. Sears

Contention 7 (design alternatives)

Carl Anderson

Contention 8

Messrs. Disney and
Weinstein

Contention 11

Roy Thompson
Roger MacClellan
Julian Preston
Jack Healy

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

CERTIFICATE OF SERVICE

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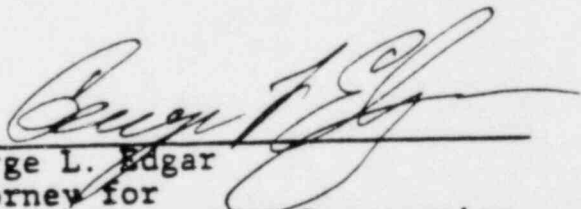
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DATED: May 28, 1982

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