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October 11, 1984

WRITERS DIRECT DIAL NUMBER

202-822-1084

Lynne Bernabei, Esq.
1555 Connecticut Ave. NW #202
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58-2895P

Dear Lynne:

In one of your letters to me dated October 8, 1984, you request that Licensee produce in the next week or two what I expect may turn out to be a large volume of documents related to TMI-1 and 2 leak rate testing. Licensee is reviewing that request and I expect to make documents available for TMIA's review. I will inform you when arrangements have been made, but I do not expect that necessarily to occur in the next week or two.

In the same letter, you requested that I respond this week to your additional request to participate in Mr. Stier's currently ongoing investigative interviews. As you know, Mr. Stier has been retained by the Licensee to conduct independent investigations of leak rate testing at TMI-1 and TMI-2. To the extent that Mr. Stier is conducting interviews as part of these investigations, it is he and his staff who are deciding whom to interview and what format the interviews are to take. No one from the Licensee or this law firm has been or will be present at these interviews, and Mr. Stier feels strongly that this is necessary to ensure that his investigation is as complete and independent as possible. Any participation in these interviews by TMIA or any other group, with the necessary accompanying participation by this law firm, would potentially hinder the independence of Mr. Stier's

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Lynne Bernabei, Esq.

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investigations. Moreover, complicating the interviews with additional attendees could adversely affect the cooperation of interviewees and, in turn, Mr. Stier's effort. Accordingly, TMIA's request to participate in the Stier interviews must be refused.

Recognizing as you do in your letter the goal of eliminating all unnecessary burden on individuals, I would hope that depositions may be minimized by virtue of your access to the Stier interviews.

Sincerely,

Emil
Ernest L. Blake, Jr.
Counsel for Licensee

ELB/TCH:em

cc: Service List