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GOVERNMENT ACCOUNTABILITY PROJECT

Institute for Policy Studies  
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August 20, 1984

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David R. Lewis, Esquire  
Shaw, Pittman, Potts & Trowbridge  
1800 M Street N.W.  
Washington, D.C. 20036

DOCKETED  
OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of  
Metropolitan Edison Company  
(Three Mile Island Nuclear Station, Unit No. 1)  
Docket No. 50-289 SP

Dear David:

I agree with your wording of all discovery requests which we discussed on August 13, 1984. The only editorial change I believe we made and was not noted in your letter of August 17, 1984, was the following to subpart (b) of Interrogatory Nos. 4, 5, 6, and 7:

- (b) the persons participating in each such method or line of communication or reporting, and the substance of his/her participation.

In addition, I wished to verify that with respect to all document requests and interrogatories whose language we clarified or narrowed on August 13, 1984 you, on behalf of General Public Utilities, will not object to responding on the ground the requests are burdensome, oppressive, or overbroad, other than maintaining the scope objections you put forward in GPU's Motion for Protective Order filed on August 15, 1984. This agreement applies to TMIA Document Request No. 7 and TMIA Interrogatory Nos. 2, 3, 4, 5, 6, 7, 9, and 42.

If your understanding differs in any respect from mine, please contact me immediately.

Sincerely yours,

*Lynne Bernabei*  
Lynne Bernabei  
Attorney for Three Mile Island Alert

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PDR ADOCK 05000289  
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cc: Service List

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