SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

1800 M STREET, N. W.

WASHINGTON, D. C. 20036

August 21, 1984

TELECOPIER (202) 822-1099 & 822-1199

> RAPIFAX 100 (202) 822-1072

TELEPHONE (505) 955-1000

TELEX 89-2693 (SHAWLAW WSH)

CABLE "SHAWLAW"

WRITER'S DIRECT DIAL NUMBER

(202) 822-1474

*84 AGO 22 All :46

Lynne Bernabei, Esquire Government Accountability Project 1555 Connecticut Avenue, N.W. Suite 202 Washington, D.C. 20036

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

Dear Lynne:

In your letter of August 20, 1984, you asked us to verify that Licensee would not object on grounds other than scope to TMIA Document Request No. 7 and Interrogatory Nos. 2, 3, 4, 5, 5, 7, 9, and 42. During our August 13, 1984 meeting, this matter was not discussed and no such agreement was reached. However, Licensee will make a good faith effort to answer the document request and interrogatories. Nevertheless, in the event such effort does not prove to be wholly successful, Licensee reserves the right to object to further efforts as burdensome and unreasonable.

Sincerely,

David R. Lewis

Counsel for Licensee

cc Per attached service list

8408230207 840821 PDR ADOCK 05000289

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter)
METROPOLITAN EDISON COMPANY) Docket No. 50-289 SP
(Three Mile Island Nuclear Station, Unit No. 1)) (Restart Remand on Management))

SERVICE LIST

Nunzio J. Palladino, Chairman U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Thomas M. Roberts, Commissioner U.S. Nuclear Regulatory Commission Washington, D.C. 20555

James K. Asselstine, Commissioner U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Frederick Bernthal, Commissioner U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Lando W. Zeck, Jr., Commissioner U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Administrative Judge
Gary J. Edles, Chairman
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
ion John H. Buck
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
ion Washington, D.C. 20555

Administrative Judge
Christine N. Kohl
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Ivan W. Smith, Chairman
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Sheldon J. Wolfe
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Gustave A. Linenberger, Jr.
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

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

Jack R. Goldberg, Esq. (4)
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Thomas Y. Au, Esq.
Office of Chief Counsel
Department of Environmental
Resources
505 Executive House
P.O. Box 2357
Harrisburg, PA 17120

Mr. Henry D. Hukill Vice President GPU Nuclear Corporation P.O. Box 480 Middletown, PA 17057

Mr. and Mrs. Norman Aamodt R.D. 5 Coatesville, PA 19320

Ms. Louise Bradford TMI ALERT 1011 Green Street Harrisburg, PA 17102

Joanne Doroshow, Esquire The Christic Institute 1324 North Capitol Street Washington, D.C. 20002

Lynne Bernabei, Esq.
Government Accountability
Project
1555 Connecticut Avenue
Washington, D.C. 20036

Ellyn R. Weiss, Esq.
Harmon, Weiss & Jordan
2001 S Street, N.W., Suite 430
Washington, D.C. 20009

Michael F. McBride, Esq. LeBoeuf, Lamb, Leiby & MacRae 1333 New Hampshire Avenue, N.W. Suite 1100 Washington, D.C. 20036

Michael W. Maupin, Esq. Hunton & Williams 707 East Main Street P.O. Box 1535 Richmond, VA 23212