AMERICAN SOCIETY OF UTILITY INVESTORS

PRESIDENT Dr. James R. Spang

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August 24, 8498460 28 P2:43

ご教会

Samuel J. Chilk, Secretary U. S. Nuclear Regulatory Commission Washington, DC 20555

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Dear Mr. Chilk:

We greatly appreciated receiving the invitation you extended through Mr. Combs to submit written testimony in conjunction with the GPU public hearing conducted on Wednesday, August 15, 1984. Please include the attached document as part of the official record.

But, first let me just say this about the document: Because we believe the record is already replete with testimony that can be understood, tested and confirmed, we hesitated to repeat the tired "Here's another version;" or "We told you so;" or, "Please don't listen to them. They don't know what they're talking about." Rather, we believe that if any element is missing, it's a philosophical discussion of the "management integrity" issue as it relates to language.

We have, therefore, examined this issue along two dimensions simply to illustrate the philosophical shortcomings of the phrase "management integrity." Obviously, much more could be said, but we will leave that to the fertile minds of our readers.

If there are any questions, or if we can be of any other service to you or the Commission in this matter, please let us know.

Sincerely, James R. Spang

JRS:aks Attachment

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> > "INVESTMENT IS THE FOUNDATION OF GROWTH"