

RELATED CORRESPONDENCE

HARMON, WEISS & JORDAN

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DOCKETED
USNRC



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'84 AUG 31 AM 10:03

August 28, 1984

OFFICE OF SECRETARY
NRC

Ernest Blake, Jr. Esq.
Shaw, Pittman, Potts and Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036

Re: GPU Interrogatories, TMI-1 Restart

Dear Mr. Blake, *ERW*

On August 21, 1984, I received your first set of interrogatories and document requests to UCS. You state that you "assume" that UCS's response "will reflect the collective knowledge of any intervenor who has an interest in or desires to participate" in the covered areas of training. You ask us to inform you if licensee is "incorrect in its assumption."

This is to inform you that UCS's responses will reflect UCS's knowledge regarding the issues in question. While the agreement on lead intervenors anticipates that UCS will act as lead during the hearing on some training issues, and we are in fact cooperating with other parties during discovery, particularly to prevent insofar as possible serving duplicative requests on GPU, UCS does not have the resources nor is it obliged under any order to answer discovery requests with any but UCS's own knowledge. The intervenors maintain their independent party status in this case as I am sure you are aware, just as GPU and the NRC staff do.

Very truly yours,

A handwritten signature in dark ink, appearing to be "ERW", is written below the closing.

Ellyn R. Weiss

cc: TMI-1 licensing Board Service List

ERW:nf

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PDR ADOCK 05000289
G PDR