

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

Before the Atomic Safety and Licensing Board

In the Matter of)
)
METROPOLITAN EDISON COMPANY)
)
(Three Mile Island Nuclear)
Station, Unit No. 1))

Docket No. 50-289 SP
(Restart - Management Phase)

DOCKETED
USNRC

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

THREE MILE ISLAND ALERT'S THIRD SET OF INTERROGATORIES AND
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS TO
GENERAL PUBLIC UTILITIES

To: GENERAL PUBLIC UTILITIES NUCLEAR CORPORATION

Pursuant to 10 C.F.R. 2.740b and 2.741, intervenor Three Mile Island Alert ("TMIA") requests that licensee General Public Utilities Nuclear Corporation ("GPU") answer separately, fully in writing, and under oath or affirmation, each of the following interrogatories, by or before September 18, 1984, and produce and make available for inspection and copying the original or best copy of all documents identified in the response to these interrogatories.

These interrogatories and requests for production are deemed to be continuing, and any additional information or documents relating in any way to these interrogatories or request for production which GPU acquires subsequent to the date of its response, up to and including the time of hearing, should be furnished to intervenor promptly after such information or documents are acquired.

INSTRUCTIONS

A. All information is to be divulged which is in your possession or under your control, or is in the possession or under the control of your present or former managers, officers, directors, executives, employees, staff, attorneys, consultants, accountants, or their agents, representatives or attorneys.

B. Where an individual interrogatory calls for an answer which involves more than one part, each part of the answer should be set out so that it is clear to which interrogatory it refers.

C. Where identification of a person is required, state the following: his/her full name; his/her current home and business address; if his/her current addresses are not known, his/her last known home and business address; the position(s) he/she held with GPU at any time; his/her home and business address at the time for which the interrogatory requests information; his/her current employer and position.

D. Where identification of a document is required, state the following: its date; its exact title; the general subject matter of the document; the author and his/her affiliation, office or business, presently and at the time the document or correspondence was prepared; the last known address of every person to whom a copy of the document was to be sent, other than the addressee described above; the name and address of all persons who now have the original and/or copies; the identification and location of the files where the original and each copy is kept in the regular course of business and the custodian thereof; and whether the document will be made available for inspection and copying, and the site of such voluntary production.

E. If GPU contends that the answer to any interrogatory is privileged, in whole or in part, or otherwise objects to any part of any interrogatory, state the reasons for each objection or grounds for exclusion, and identify each person having knowledge of the factual basis, if any, on which the privilege or other ground is asserted.

F. If an interrogatory could, at one time, have been answered by consulting documents which are no longer in existence, in answer to such interrogatory:

1. identify what information was maintained;
2. identify all documents which contained such information;
3. state the time period during which such documents were maintained;
4. state the circumstances under which such documents ceased to exist;
5. state the date when such documents ceased to exist;
6. identify all persons having knowledge of the circumstances under which such documents ceased to exist; and
7. identify all persons who have knowledge or had knowledge of the documents and their contents.

G. As used herein and unless the context otherwise required, the terms:

(i) "NRC" shall mean the Nuclear Regulatory Commission, its branches, departments, sections, offices, subdivisions, its present and former commissioners, administrators, officials, inspectors, investigators, staff, consultants, contractors, attorneys, employees, agents, representatives and accountants, or their agents, attorneys and representatives.

(ii) "General Public Utilities" or "GPU" shall mean General Public Utilities, any of its subsidiaries, including but not limited to GPU Nuclear Corporation and Metropolitan Edison Company, its or its subsidiaries' branches, divisions, departments, sections, affiliates, offices, present and former officers, directors, management, board of directors, employees, staff, officials, agents, consultants, attorneys, representatives or their attorneys, representatives and agents.

(iii) "Document" shall mean every writing of every type and description, and every other instrument or device by which, through which or on which information has been recorded and/or preserved, including but not limited to memoranda, including those reflecting meetings, discussions or conversations, notes, letters, drawings, files, graphs, charts, maps, photographs, deeds, agreements, contracts, handwritten notes, diaries, logs, ledgers, studies, data sheets, notebooks, books, appointment calendars, telephone bills, telephone messages, receipts, vouchers, minutes of meetings, pamphlets, computations, calculations, accounting(s), financial statements, voice recordings, computer printouts, computer discs and programs, and other data compilations, device or media on which or through which information of any type is transmitted, recorded or preserved. The term "document" also means every copy of a document when such copy is not an identical duplicate of the original.

(iv) "Person" shall refer to any natural person, firm, partnership, joint venture, trust, corporation, holding company, or any other entity natural or legal, domestic or foreign.

(v) "Communication" shall mean communication, discussion, conversation, contact, letter, memorandum, telephone call, telegram,

message or direction, whether written or oral, and whether in person, by telephone or by mail.

INTERROGATORIES

Identify all persons GPU intends to call as a witness on the remanded issue of the Dieckamp mailgram. For each such person identified above, identify the following:

(a) the nature or substance of his testimony;

(b) his qualification, access to information, or other reason that he is being asked to testify as to the information identified in response to subpart (a) above;

(c) his position or relationship to GPU at any time from the time of the accident to the present, including but not limited to any contracts, consulting arrangements, advisory positions or other relationships with GPU he has held or holds currently;

(d) all documents he has reviewed or will review to prepare his testimony;

(e) all persons whom he has consulted or will consult to prepare his testimony;

(f) the nature and substance of any discussions, conversations, communications, and other contacts he has had or will have with the persons identified in response to subpart (e) above;

(g) all documents he intends to rely on or use in support of any opinions, evaluations, conclusions, or recommendations he makes in his testimony;

(h) the current location and custodian of all documents identified in response to subparts (d) and (g) above.

2. Identify and produce all documents which GPU intends to introduce in the hearing or through prefiled testimony on the

remanded issue of the Dieckamp mailgram.

3. Produce all documents identified in response to Interrogatory No. 1(d), (g) and (h) above.

4. For each person whom GPU has identified in response to an interrogatory in TMIA's First Set of Interrogatories or Second Set of Interrogatories to General Public Utilities, state the following:

- (a) his/her current home and business address;
- (b) if his/her current addresses are not known, his/her last known home and business address;
- (c) the positions he/she has held with GPU at any time;
- (d) his/her home and business address at the time for which the interrogatory requests information;
- (e) his/her present employer and position.

Respectfully submitted,

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DATED: September 4, 1984

Attorneys for Three Mile Island
Alert

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

I hereby certify that I have served this 4th day of ^{'84} ~~September~~ ^{SEP 4} 1984 a copy of the foregoing TMIA's Response to GPU's First Set of Interrogatories and First Request for Production; TMIA's Motion for Reconsideration, or, in the Alternative, Motion for Directed Certification; TMIA's Third Set of Interrogatories and Third Request for Production to GPU; and TMIA's Second Set of Interrogatories to NRC Staff

on the following by mail, first-class, postage prepaid:

- | | |
|--|--|
| * Administrative Judge Ivan W. Smith, Chairman Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555 | Thomas Au, Esq. Office of Chief Counsel Department of Environmental Resources 505 Executive House P.O. Box 2357 Harrisburg, PA 17120 |
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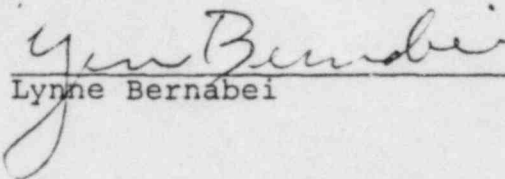
* Served by hand, Sept. 4, 1984.

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