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September 4, 1984

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Executive Director for Operations

SEP-5 11:13

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

UNION OF CONCERNED SCIENTISTS' FIRST REQUEST TO THE EXECUTIVE DIRECTOR FOR OPERATIONS FOR PRODUCTION OF DOCUMENTS

Pursuant to 10 C.F.R. § 2.744, the Union of Concerned Scientists requests the Executive Director for Operations to make the documents described below available for inspection and copying in connection with this proceeding.

DEFINITIONS

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

(b) "General Public Utilities" or "GPU" shall mean General Public Utilities, any of its subsidiaries, including but not

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limited to GPU Nuclear Corporation and Metropolitan Edison Company, and its subsidiaries' branches, divisions, departments, sections, affiliates, offices, present and former officers, directors, management, board of directors, employees, staff, officials, agents, consultants, attorneys representatives and their attorneys, representatives and agents.

(c) "Document" shall mean every writing of every type or 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, notes, letters, drawings, files, graphs, charts, photographs, slide presentations, handwritten notes, logs, ledgers, studies, data sheets, appointment calendars, telephone messages, meeting minutes, calculations, computations, financial statements, voice recordings and other data compilations or every other device or media on which or through which information of any type is transmitted, recorded or preserved.

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

(e) "Communication: shall mean discussion, conversation, letter, memorandum, telephone call, message or direction, whether written or oral or whether in person, by telephone or by mail.

(f) "Special Report" shall mean the Special Report or the Reconstituted OARP Review Committee, dated June 12, 1984.

INSTRUCTIONS FOR USE

A. You must make available for inspection or copying all documents that are in your possession or under your control, or in the possession or under the control of your officers, management, executives, employees, staff, directors, officials, attorneys, consultants, accountants, inspectors, investigators, or representatives, or their agents, representatives or attorneys.

B. If NRC contends that any document responsive to any request for production listed below is privileged in whole or in part, or otherwise objects to any part of any request, state the reason 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.

C. If any document responsive to any request for production is no longer in existence, then answer the following questions:

- (1) identify what information was maintained in that document;
- (2) identify the type of document which contained such information;
- (3) state the time period during which such document was maintained;
- (4) state the circumstances under which such document ceased to exist;
- (5) state the date when such document ceased to exist;

(6) identify all persons having knowledge of the circumstances under which such document ceased to exist; and

(7) identify all persons who have knowledge or had knowledge of the document and the contents thereof.

This Request for Production is deemed to be continuing such that NRC is requested to supplement production with all responsive documents which come into its possession, custody or control subsequent to production of documents pursuant to intervenor's request.

NOTE ON NONDUPLICATION

UCS has attempted to avoid duplication of document requests made by other intervenors. Should such duplication occur despite our efforts, you may identify the duplicative document request and the documents that you have provided in response to another intervenor's document request that you believe are responsive to UCS' document request. Should UCS' document request be broader than the other intervenor's, you must provide the additional documents as well as identifying those that you have already provided.

DOCUMENTS REQUESTED

1. All documents identified in response to the following Interrogatories in UCS' First Set of Interrogatories to NRC Staff: Interrogatory 2(c), 2(d)(testimony), 2(e), 2(g), 5(d), 5(f), 6 (examinations), 7(c), 9(e), 14, 15, 16, and 19. UCS' First Set of Interrogatories to NRC Staff accompanies to this document request for your reference.

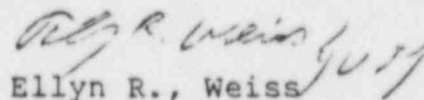
2. All documents describing, explaining, or providing instructions or directions for the process by which written and oral examinations are designed and questions prepared by the NRC Staff.

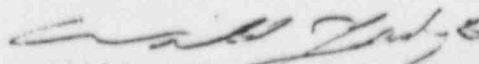
3. All documents related to any review or evaluation of the GPU training program by the NRC Staff, its agents or consultants, since March 1979.

4. All documents related to the performance of GPU employees since March 29, 1979, on examinations administered by GPU or the NRC Staff.

All of these documents are relevant to this proceeding because they bear upon the GPU training program and methods by which that program is or can be evaluated.

Respectfully submitted,


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Dated: September 4, 1984