

882

RELATED CORRESPONDENCE

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

1800 M STREET, N. W.  
WASHINGTON, D. C. 20036

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September 14, 1984

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

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

Dear Lynne:

Enclosed are the affidavits to accompany Licensee's  
Response to Three Mile Island Alert's First Set of Interroga-  
tories and First Request for Production (September 4, 1984).

Sincerely,  
*David R. Lewis*

David R. Lewis  
Counsel for Licensee

cc Service List (w/encl.)

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PDR ADDCK 05000289  
G PDR

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

AFFIDAVIT OF R. L. CLAYTON

State of Pennsylvania )  
County of Dauphin ) ss.

R. L. Clayton, being duly sworn according to law, desposes and says that he is the Supervisor - Litigation Support, GPU Service Corporation, that the information contained in Licensee's Response to Three Mile Island Alert's First Set of Interrogatories, number 1 is true and correct to the best of his knowledge and belief.

R. L. Clayton  
Supervisor - Litigation Support  
GPU Service Corporation

Sworn to and subscribed  
before me this 11<sup>th</sup> day  
of September, 1984.

  
Notary Public

**JULIA E. PARK, Notary Public**  
Middlestown, Dauphin County, Pa.  
My Commission Expires Nov. 3, 1985

My Commission Expires:

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

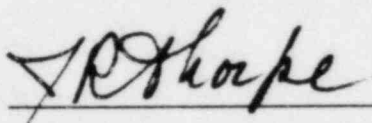
In the Matter of )  
)  
)  
METROPOLITAN EDISON COMPANY )  
)  
)  
(Three Mile Island Nuclear )  
Station, Unit No. 1 )

Docket No. 50-289SP  
(Restart - Remand on Mgt.)

AFFIDAVIT OF J. R. THORPE

State of New Jersey )  
County of Morris ) ss.

J. R. Thorpe, being duly sworn according to law, deposes and says that he is the Director - Licensing and Regulatory Affairs of GPU Nuclear Corporation, that the information contained in Licensee's Response to Three Mile Island Alert's First Set of Interrogatories, numbers 2, 4, 6, 7, 8, 10, 12, 23, 24, 25, 26, 32, 33, 35, 41, 49, 50 and 51 are true and correct to the best of his knowledge and belief.



J. R. Thorpe  
Director - Licensing and  
Regulatory Affairs

Sworn to and subscribed  
before me this 6<sup>th</sup> day  
of September, 1984



Notary Public

My Commission Expires: September 22, 1988

0626u

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

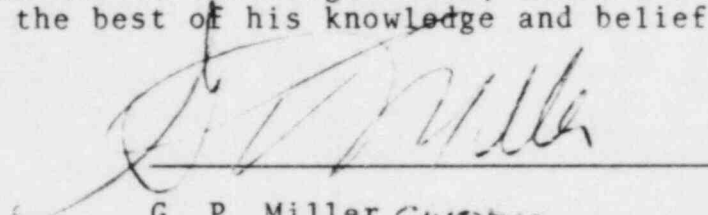
In the Matter of )  
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METROPOLITAN EDISON COMPANY )  
 )  
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(Three Mile Island Nuclear )  
Station, Unit No. 1 )

Docket No. 50-289SP  
(Restart - Remand on Mgt.)

AFFIDAVIT OF G. P. MILLER

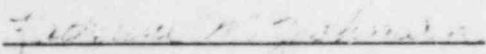
State of Pennsylvania )  
County of Berks ) ss.

G. P. Miller, being duly sworn according <sup>Generation</sup> to law, deposes and says that he is presently the Director of Operations - Metropolitan Edison Company and on March 28, 1979 he was the Station Manager for TMI, that the information contained in Licensee's Response to Three Mile Island Alert's First Set of Interrogatories, numbers 3 and 9 are true and correct to the best of his knowledge and belief.



G. P. Miller <sup>Generation</sup>  
Director of Operations  
Metropolitan Edison Company

Sworn to and subscribed  
before me this 11th day  
of September, 1984



Notary Public

KATHERINE M. ZECHMAN, Notary Public  
Muhlenberg Twp., Berks County, Pa.  
My Commission Expires Nov. 23, 1987

My Commission Expires: \_\_\_\_\_

0621u

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



Before the Atomic Safety and Licensing Board

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

Docket No. 50-289SP  
(Restart - Remand on Mgt.)

AFFIDAVIT OF G. F. KUNDER

State of Pennsylvania )  
County of ~~Dauphin~~ Berks ) ss.

A.  
G. F. Kunder, being duly sworn according to law, deposes and says that he is presently the Manager, TMI-2 Safety Review Group, GPU Nuclear Corporation, and on March 28, 1979 he was TMI Unit II - Superintendent - Technical Support, Metropolitan Edison Company, that the information contained in Licensee's Response to Three Mile Island Alert's First Set of Interrogatories, number 5 is true and correct to the best of his knowledge and belief.

A.  
G. F. Kunder  
Manager, TMI-2 Safety Review Group  
GPU Nuclear Corporation

Sworn to and subscribed  
before me this 12 day  
of September, 1984

Notary Public

Bern Township, Berks County, PA

My Commission Expires: Nov. 8, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

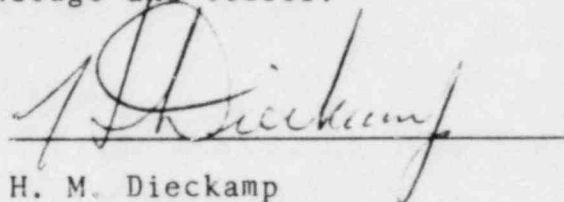
Before the Atomic Safety and Licensing Board

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

AFFIDAVIT OF H. M. DIECKAMP

State of New Jersey )  
County of Morris ) ss.

H. M. Dieckamp, being duly sworn according to law, deposes and says that he is presently the President, GPU Service Corporation and on March 28, 1979 he was President, GPU Service Corporation, that the information contained in Licensee's Response to Three Mile Island Alert's First Set of Interrogatories, numbers 14, 15, 16, 34, 44, 45, 46, 47, 48, 52, 53, 54, 55, 56, 57 and 58 are true and correct to the best of his knowledge and belief.



H. M. Dieckamp  
President  
GPU Service Corporation

Sworn to and subscribed  
before me this 10<sup>th</sup> day  
of September, 1984



Notary Public

ROBERT MISLURA  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires June 16, 1987

My Commission Expires: \_\_\_\_\_

0626u

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

AFFIDAVIT OF M. MORRELL

State of New Jersey )  
County of Morris ) ss.

M. Morrell, being duly sworn according to law, deposes and says that he is presently the Assistant Treasurer - GPUSC and on March 28, 1979 he was an Engineer III - Power Plant Systems Engineer - GPUSC, that the information contained in Licensee's Response to Three Mile Island Alert's First Set of Interrogatories, number 36 is true and correct to the best of his knowledge and belief.

M. Morrell

M. Morrell  
Assistant Treasurer  
GPU Service Corporation

Sworn to and subscribed  
before me this 10<sup>th</sup> day  
of September, 1984

Mildred Anisora

Notary Public

MILDRED ANISORA  
NOTARY PUBLIC OF NEW JERSEY  
~~My Commission Expires June 14, 1985~~

My Commission Expires:

0627u

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

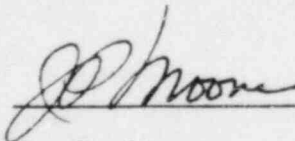
Before the Atomic Safety and Licensing Board

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

AFFIDAVIT OF J. P. MOORE

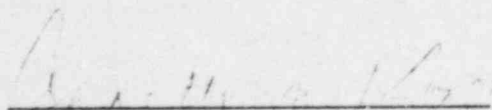
State of New Jersey )  
County of Morris ) ss.

J. P. Moore, being duly sworn according to law, deposes and says that he is presently Consulting Engineer, GPU Nuclear Corporation and on March 28, 1979 he was Manager of Mechanical Components - CPU, that the information contained in Licensee's Response to Three Mile Island Alert's First Set of Interrogatories, number 40 is true and correct to the best of his knowledge and belief.



\_\_\_\_\_  
J. P. Moore  
Consulting Engineer  
GPU Nuclear Corporation

Sworn to and subscribed  
before me this 10 day  
of September, 1984



\_\_\_\_\_  
Notary Public

My Commission Expires: September 20 1985

0628u



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

AFFIDAVIT OF M. J. ROSS

State of Pennsylvania )  
County of Dauphin ) ss.

M. J. Ross, being duly sworn according to law, deposes and says that he is presently the Manager, Plant Operations - TMI-1 and on March 28, 1979 he was Supervisor Operations TMI-1, that the information contained in Licensee's Response to Three Mile Island Alert's First Set of Interrogatories, numbers 42 and 43 are true and correct to the best of his knowledge and belief.

M. J. Ross

M. J. Ross  
Manager, Plant Operations - TMI-1  
GPU Nuclear Corporation

Sworn to and subscribed  
before me this 12th day  
of September, 1984

David John Camp

Notary Public

My Commission Expires: June 17, 1985

0625u

DAVID JOHN CAMP - NOTARY PUBLIC  
MIDDLETOWN BORO DAUPHIN COUNTY  
MY COMMISSION EXPIRES JUNE 17, 1985  
MIDDLETOWN BORO DAUPHIN COUNTY

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  
 ) (Restart Remand on Management)  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

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

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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

Administrative Judge  
Gustave A. Linenberger, Jr.  
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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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Washington, D.C. 20555

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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

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