

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

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WASHINGTON, D. C. 20036

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BRANCH

TELEX  
89-2693 (SHAWLAW WSH)  
CABLE "SHAWLAW"

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September 13, 1984

ERNEST L. BLAKE, JR., P.C.

Lynne Bernabei, Esq.  
Government Accountability  
Project  
1555 Connecticut Avenue N.W.  
Washington, D.C. 20036

DOCKET 50-289 SP  
PROD 7/10/84

Dear Lynne:

Your letter to me of September 12 requests the position of seventeen named individuals (which you have subsequently explained means employment positions as of March 28, 1979) and proposes that TMIA pay copying charges for Licensee-produced documents on a weekly basis.

The positions of the seventeen named individuals follows:

- |     |  |  |
|-----|--|--|
| 1.  | Joseph H. DeMan                          | Foreman Radiation Protection                 |
| 2.  | Lorraine Beeman<br>(maiden name Espy)    | Rad Chem Tech Jr.                            |
| 3.  | J. K. Lionarons                          | Aux Operator A                               |
| 4.  | Donald E. Smith                          | Control Room Operator                        |
| 5.  | David E. Zeiter                          | Rad Chem Tech                                |
| 6.  | James P. Moore                           | Mechanical Components Engineering<br>Manager |
| 7.  | A. P. Rochino                            | Engineering Mechanics Manager                |
| 8.  | Richard L. Benner                        | Rad Chem Tech Jr. 2nd                        |
| 9.  | R.E. Boyer                               | Control Room Operator                        |
| 10. | G.L. Cvijic                              | Aux Operator B                               |
| 11. | David A. Kemble                          | Repairman 1st Cl (Certified Welder)          |
| 12. | T.L. Mulleavy                            | Supervisor Radiation Protection              |
| 13. | Ron Natale                               | Repairman 1st Cl (Certified Welder)          |
| 14. | David Reich                              | Instrumentman 1st Class                      |
| 15. | T. Riggenbach                            | Instrumentman 1st Class                      |
| 16. | Juanita Gingrich<br>(maiden name Wehler) | Aux Operator C                               |
| 17. | Matthew Joyce                            | Instrumentman 2nd Class                      |

Additionally I am informed today that Licensee has just received completed questionnaires by Edward Hahn and Curtis A. Conrad with affirmative responses to question 3(a). Assuming the positions of these individuals will be of equal interest in view of your request, I am informed their positions on 3/28/79

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Lynn Bernabei, Esq.

September 13, 1984

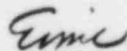
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were UC&M 2nd Class 2nd Yr. (Utility Construction & Maintenance) and Auxiliary Operator C, respectively. These questionnaires will be placed in the Discovery Room when we receive them from Licensee's offices in New Jersey.

As I have further informed you, Licensee has conducted some follow-up on individuals who answered 3(a) affirmatively. The results of that follow-up will be documented in the Discovery Room materials. We intend to advise TMIA when such documents are placed in the Discovery Room.

As for TMIA's payment for document copying, Licensee agrees to invoice TMIA for copying charges on a weekly basis as you propose. Although the past practice in this proceeding was to receive payment as the documents were provided to TMIA, we will modify our system based on your representation of prompt payment. We intend to provide invoices each Friday to you at GAP's offices and will expect payment at our offices the following Monday as you proposed on the phone yesterday.

Sincerely,



Ernest L. Blake, Jr.

cc: Service List

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) )

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