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RELATED TO...

**GOVERNMENT ACCOUNTABILITY PROJECT**

1555 Connecticut Avenue, N.W., Suite 202  
Washington, D.C. 20036

DOCKET #  
USNRC

(202) 232-8550

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HAND DELIVERED

September 12, 1984

DOCKETING & SERVICE  
BRANCH

50-289 SP

Ernest Blake, Esquire  
Shaw, Pittman, Potts & Trowbridge  
1800 M Street NW  
Washington, D.C. 20036

Dear Ernie:

After reviewing today the documents General Public Utilities has produced in response to TMIA discovery requests, I found 17 individuals, all apparently employees of GPU, who stated in questionnaires submitted to GPU that they knew of the hydrogen explosion or combustion on March 28, the first day of the accident. I requested orally of you and repeat in this letter a request that you attempt to determine the positions of these individuals in order that TMIA is able to determine whether or not to notice their depositions.

The individuals whose positions I request are the following: John Deman, Lorraine Beeman, J.K. Lionarons, Donald Smith, David Zeiter, James P. Moore, A.P. Rochino, Richard Benner, Robert Boyer, George Cvijic, David Kemble, Thomas Mulleavy, Ron Natale, David Reich, Thomas Riggerback, Juanita Gingrich, and Matthew Joyce.

I understand from our conversation this afternoon that you will attempt in an expeditious manner to determine their positions within the company.

In addition we discussed TMIA's payment to GPU for copies made of the documents produced. I requested that you bill TMIA on a weekly basis for all copies made available during the week and that TMIA would pay each bill within a few days. Please advise me at your earliest convenience if this would be a feasible method to proceed with production of discovery documents to TMIA.

Sincerely yours,

Lynne Bernabei  
Attorney for Three Mile Island  
Alert

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PDR ADOCK 05000289  
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cc: Service List

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