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RELATED CORRESPONDENCE

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September 14, 1984

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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. 50-289 <i>SP</i>
)	(Restart Remand
(Three Mile Island Nuclear)	on Management)
Station, Unit No. 1))	

LICENSEE'S REQUEST TO MODIFY TMIA'S
SUBPOENAS DUCES TECUM

On or about September 11, 1984, TMIA served Notices of Deposition or Subpoenas on the following employees or ex-employees of GPU and B&W:

- John Herbein
- Herman Dieckamp
- Robert C. Arnold
- Gary Miller
- George Kunder
- Michael Ross
- Craig Faust
- Hugh McGovern
- Ivan Porter
- Brian Mehler
- Theodore Illges
- Leland Rogers
- Joseph Chwastyk
- John Flint

Licensee has also received copies (unsigned) of Subpoenas Duces Tecum for each of these individuals. Each Subpoena Duces Tecum

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requests the individual in question to produce at the deposition the following documents:

1. All personal notes, logs, diaries, and any other documents contained in your personal file, concerning the dates of March 28, March 29, and March 30, 1979.
2. All interviews in your possession which were taken concerning the March 28, 1979 accident.
3. All correspondence and other written communications between you and General Public Utilities, Metropolitan Edison Company, GPU Service Corporation, GPU Nuclear Corporation or Group, Pennsylvania Electric Company, or Jersey Central Power and Light Corp., or employees thereof regarding the dates of March 28, March 29 or March 30, 1979.
4. All correspondence and other written communications between you and General Public Utilities, Metropolitan Edison Company, GPU Service Corporation, GPU Nuclear Corporation or Group, Pennsylvania Electric Company, or Jersey Central Power and Light Corp., or employees thereof regarding reporting of information during the March 28, 1979 accident to the NRC or the Commonwealth of Pennsylvania.

Pursuant to 10 CFR 2.720(f) Licensee requests the Licensing Board to modify the Subpoena Duces Tecum as follows:

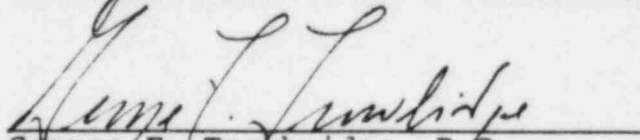
1. Consistent with the protective order granted by the Board's Memorandum and Order dated August 31, 1984, and on the ground that many of the documents sought to be produced would involve evidence not relevant to any matter in issue, Licensee requests that each Subpoena Duces Tecum (except as to Mr. Dieckamp) be modified to limit the documents to be produced to those

relating to the pressure spike, the initiation of core spray or the generation and subsequent combustion of hydrogen which occurred at TMI-2 on March 28, 1979. With respect to Mr. Dieckamp, Licensee requests that the Subpoena Duces Tecum be modified to limit the documents to be produced to those relating to Mr. Dieckamp's knowledge of the conditions of the reactor or events occurring during the accident.

2. On the ground that the Subpoenas Duces Tecum are unreasonable, Licensee requests that they be modified so as not to require the further production of any documents which have already been provided to TMIA for inspection and copying in response to TMIA document requests and interrogatories.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



George F. Trowbridge, P.C.
Ernest L. Blake, Jr., P.C.

Counsel for Licensee

Dated: September 14, 1984

September 14, 1984

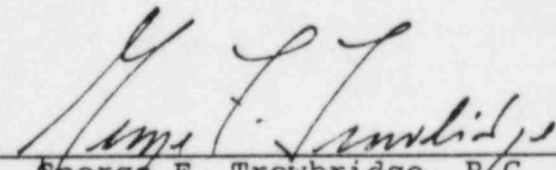
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Request to Modify TMIA's Subpoenas Duces Tecum," dated September 14, 1984, were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, or where indicated by an asterisk (*) by hand delivery, this 14th day of September, 1984.


George F. Trowbridge, P.C.

Dated: September 14, 1984

*Administrative Judge
Gustave A. Linenberger, Jr.
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Washington, D.C. 20555

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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

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