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September 19, 1984

Lynne Bernabei, Esquire
Government Accountability
Project
1555 Connecticut Avenue
Washington, D.C. 20009

RE: Metropolitan Edison et al.
Restart Remand on Management
(Docket No., 50-289) *SP*

Dear Lynne:

This letter confirms our agreement concerning TMIA's promise to timely supplement its response to "Licensee's First Set of Interrogatories and First Request for Production of Documents to TMIA" dated August 16, 1984 entitled "TMIA Response to Licensee's First Set of Interrogatories" dated September 4, 1984. We greatly appreciate the spirit of cooperation which you brought to both our meeting here in our offices yesterday, as well as during our telephone conversation today. Your recognition of our shared desire to promote full and open discovery without unnecessarily involving the Licensing Board in the settlement of our disputes has ensured that both TMIA and Licensee will be able to expeditiously devote their efforts to the preparation of their respective cases rather than becoming entangled in a needless legal dispute over TMIA's response to Licensee's first set of discovery requests.

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GENERAL INVESTIGATIVE
DIVISION
FEDERAL BUREAU OF
INVESTIGATION
WASHINGTON, D.C.

Lynne Bernabei, Esq.
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As you know, Licensee had originally intended to file a motion to compel discovery to its first set of discovery requests to TMIA. This document would have been filed today; however, in light of your representations yesterday and today relaying TMIA's intent to provide the information outlined below, Licensee does not now believe it necessary to move the Licensing Board to compel TMIA to respond fully to Licensee's first set of discovery requests to TMIA.

TMIA's agreement regarding the supplementation of its response to Licensee's first set of discovery requests is outlined as follows:

1. Interrogatory Response T-4, T-5
 - a. TMIA agrees to identify that portion of the ASLB PID referenced in ¶ (5) of its response.
 - b. TMIA agrees to identify the NRC inspection reports in ¶ (6) of its response.
 - c. TMIA agrees to identify its basis for the comments made in ¶ (11) of its response.
2. Interrogatory Response T-6
 - a. TMIA agrees to provide those specific remedies that it would consider appropriate in response to the concerns it identified in response to Interrogatory T-4.
3. Interrogatory Response T-7
 - a. TMIA agrees to identify those pages of the Rickover Report upon which it relies in its response.
4. Interrogatory Response T-8
 - a. TMIA agrees to respond fully to the revised phrasing of Interrogatory T-8 which now reads as follows: Does TMIA have concerns regarding the licensed operator training methods, procedures or practices used at TMI and, if so, what actions would be appropriate to remedy these concerns. Include in your answer

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references to any practices, procedures or methods outside of TMI on which your answer is based.

5. Interrogatory Response T-14, T-15
 - a. TMIA agrees to identify the page numbers from ALAB-772 upon which it relies in ¶¶ 2, 3, 4, and 10 of its response.
6. Interrogatory Response T-19(a)
 - a. TMIA agrees to supplement its response regarding any specific problems with the licensed operator training program identified internally and/or by the Special Master, the Licensing Board and the Appeal Board, including the appropriate page citations, and its opinion concerning the remedies that GPU could make in response to those problems.
7. Interrogatory Response T-19(b)
 - a. TMIA agrees to identify those pages of the Milhollin Report upon which it relied in its response.
8. Interrogatory Response T-22, T-23
 - a. TMIA agrees to describe specific attitude problems it perceives licensed operators have toward the training program and its suggested remedies thereto.
9. Interrogatory Response T-24(c)
 - a. TMIA agrees to provide Licensee with its opinion concerning the appropriate remedies GPU could take in response to the concerns identified in response to Interrogatory T-24(a).
10. Interrogatory Response T-25
 - a. TMIA agrees to identify those pages of the RHR Report upon which it relies to support the second paragraph of its response.

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11. Interrogatory Response T-29, T-30
 - a. TMIA agrees to supplement its response by including references to the specific portions (i.e. particular statements and page numbers) of the Special Report that contain information that TMIA criticizes;
 - b. TMIA agrees to identify the "other internal reports" referenced in ¶ (8) of its response to Interrogatory 29.

TMIA has agreed to provide the supplementation of Licensee's first set of discovery requests, as specified above, on the following schedule: citation references will be provided by September 24; other responses will be provided on October 1 and 9. TMIA understands that Licensee has agreed to this schedule based on TMIA's representation that it will respond fully to the questions specified above.

Licensee and TMIA further agree that TMIA is under no obligation to respond to those interrogatories concerning the curriculum of the licensed operator training program in view of your assurance that: TMIA considers issues concerning the curriculum of the training program to be within the province of UCS' examination; and TMIA does not intend to conduct cross examination on those issues. Specifically, Licensee hereby withdraws Interrogatories T-9, T-10 and T-11 (concerning the subject areas of Licensee's licensed operator training program); Interrogatories T-12 and T-13 (concerning the format of Licensee's exams); and Interrogatories T-17 and T-18 (whether licensed operators should be tested on or required to spend additional time at the simulator). Licensee understands that TMIA may have some questions involving those issues concerning the method of teaching applied in the licensed operator training program. TMIA agrees, however, that it will promptly provide supplemental answers concerning its views of the method of training should it decide that it intends to pursue that issue at the hearings.

Finally, as per your assurances yesterday, TMIA will also supplement those responses that it had been unable to complete at the time that it filed its initial response to Licensee's first set of discovery requests in accordance with the provisions of 10 C.F.R. § 2.740(e). Specifically, TMIA agrees to

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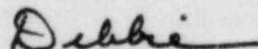
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supplement Interrogatory Responses T-16, T-24(a), T-24(b) and T-24(c).

Again, thank you for your cooperation. I also note here that Ms. Bernabei has reviewed this letter and accepts Licensee's summary of its agreement with TMIA.

Sincerely,



Deborah B. Bauser

cc: Service List