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RELATED CORRESPONDENCE

**GOVERNMENT ACCOUNTABILITY PROJECT**

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September 21, 1984

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

DOCKET NUMBER  
50-289 SP

Dear Ernie:

As I promised last Monday, I am providing you today with the names of those individuals whom we propose to depose concerning their knowledge of a hydrogen explosion or combustion on March 28, 1979. These individuals and the dates of their proposed depositions are as follow:

Wednesday, September 26

Thomas Mulleavy (previously scheduled)

Thursday, September 27

David Reich (previously scheduled)

Friday, September 28

A.P. Rochino 9:00 a.m.  
James Moore 10:00 a.m.

Thursday, October 4

Richard Benner 9:00 a.m.  
Robert Boyer 10:30 a.m.  
Curtis Conrad 12:00 noon  
George Cvijic 2:30 p.m.  
Juanita Gingrich 4:00 p.m.

After our conversation today, I realized that Mr. Moore, whom we noticed for a deposition earlier, answered that he was not aware of the hydrogen combustion/explosion on March 28. However, he was aware of in-core thermocouple temperatures in excess of 2500 degrees on March 28, as a result of an assignment he received from Parsippany corporate management to collect information at the site. Therefore, TMIA wishes to depose him on his information gathering on the in-core thermocouple data and the persons to whom he distributed that information. I have scheduled Mr. Moore for the morning of September 28.

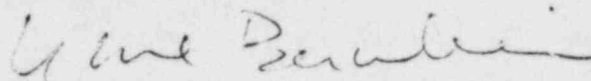
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Blake Letter  
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I have scheduled the bulk of the individuals who originally answered Question 3(a) affirmatively on October 4, 1984, in the hope that GPU's efforts to validate their answers may obviate the need for their depositions. My expectation is, of course, that we will agree to a stipulation which will eliminate the need for a deposition of Dr. Myers on October 4, 1984.

Sincerely yours,



Lynne Bernabei  
Attorney for Three Mile Island  
Alert

cc: Service List