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September 24, 1984

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In the Matter of
Metropolitan Edison Company
(Three Mile Island Nuclear Station, Unit 1)
Docket No. 50-289 - 52

Dear Lynne:

With respect to the discovery requests identified in your letter of September 20, 1984, and to the extent agreed upon in our meetings on the evenings of September 20 and 21, 1984, we will attempt to provide by supplemental response the information below. We understand that you in turn will not file supplemental interrogatories or a motion to compel to obtain this information.

Interrogatory No. 2

Licensee will identify any dedicated telephone lines that were established on March 28, 1979, between TMI and the NRC or between Parsippany and the NRC. Licensee will indicate the time at which each line was established, the place from which and to which the line ran, and the length of time it was maintained.

Interrogatory Nos. 4-6

Licensee will identify the same information for dedicated telephone lines between B&W in Lynchburg and the NRC in Bethesda; between TMI or Parsippany and the Commonwealth of Pennsylvania; and between TMI or Parsippany and B&W in Lynchburg.

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Interrogatory No. 12

Per your request, Licensee will provide a physical description of the alarms actuated by the pressure spike.

Interrogatory No. 13

As we informed you yesterday, reproductions of the wide and narrow range containment pressure recorders and the reactor coolant pressure recorder are located in the Discovery Room in files D-10(2), D-10(4), and D-10(6). We understand that no further response is necessary.

Interrogatory No. 15

Licensee will identify, to the extent it is able, the GPU personnel who attended the May 7, 1979, Congressional visit to TMI. Licensee now will inquire from Messrs. Herbein and Arnold whether they remember the substance of any conversations relating to the generation or subsequent combustion of hydrogen, the pressure spike, or the initiation of containment spray. TMIA will promptly inform Licensee whether it desires similar inquiry of other persons once they are identified.

Interrogatory Nos. 16 and 34

Licensee will inquire whether any of the following individuals remember the substance of any communication with Mr. Dieckamp on March 28, 29 or 30, 1979 concerning the topics of these interrogatories. The individuals are: Messrs. Miller, Arnold, Herbein, Kurder, Long, Keaton, Wallace, Kuhns, Wilson, and Blake.

Interrogatory No. 28

Licensee will answer this interrogatory with respect to Mr. Dieckamp's knowledge concerning the identity of the person who instructed Emergency Team personnel to cease the depressurization strategy and begin a repressurization strategy.

Interrogatory No. 37

In accordance with the Board's protective order, Licensee need not respond to this interrogatory.

Lynne Bernabei, Esq.

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Interrogatory No. 39

Licensee will address this interrogatory to Mr. Troffer and provide his supplemental response.

Interrogatory Nos. 42-43

Licensee will attempt to identify the person who performed a containment check at 2:05 p.m., whether any action was taken in response, and whether anybody was informed of the results of the check.

Interrogatory Nos. 44-47

Licensee will ask Mr. Dieckamp to identify any conversations that he had with GPU officers or employees relating to the possible falsity of the mailgram and/or the need for corrective action.

Interrogatory No. 48

Licensee will attempt to identify when Licensee first obtained a copy of the transcripts of the Mehler and Chwastyk I&E interviews in 1979.

Interrogatory No. 51

Licensee will attempt to identify the routine distribution for the interview memoranda produced in response to Document Request No. 11.

Interrogatory Nos. 52 and 58

Licensee will attempt to identify current GPU system personnel who attended a GPU Board or annual meeting with Mr. Dieckamp on May 8 or 9, 1979. Licensee will ask these individuals whether Mr. Dieckamp consulted with these individuals prior to sending the Mailgram and to identify any conversations with Mr. Dieckamp on May 8 or 9 concerning the N.Y. Times article, the mailgram, or Licensee's appreciation on March 28 of the severity of the accident.

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Additional Requests

Licensee will undertake to provide further confirmation of the supplemental responses of the individuals who initially answered affirmatively on the questionnaire.

With respect to TMIA's request for identification of the authorship of documents, TMIA will further specify the documents on which further such information is desired. Licensee will attempt to provide this information.

Licensee has already identified the location of the thermocouple data. (File I-16(1)). Licensee will attempt to identify the documents referred to in Mr. Harbin's and Orlandi's questionnaires.

Sincerely,

Emil

Ernest L. Blake, Jr., P.C.
Counsel for Licensee

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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