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RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
OFFICE OF SECRETARY
OF LICENSING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-289 SP
)	
(Three Mile Island Nuclear)	(Restart Remand on Management)
Station, Unit No. 1))	

LICENSEE'S FIFTH SET OF INTERROGATORIES
TO INTERVENOR THREE MILE ISLAND ALERT, INC.

These interrogatories are directed to Intervenor Three Mile Island Alert, Inc. (hereinafter TMIA) and pertain to the reopened hearing on the Dieckamp mailgram. See Metropolitan Edison Co. (Three Mile Island Nuclear Generating Station, Unit 1), ALAB-772, 19 N.R.C. ____, slip op. at 128-134 (May 24, 1984). See also Memorandum and Order Following Prehearing Conference (July 9, 1984).

The interrogatories are filed pursuant to 10 C.F.R. § 2.740b, which requires that they be answered separately and fully in writing under oath or affirmation, within 14 days after service. The interrogatories are intended to be continuing in nature, and the answers must be immediately supplemented or amended, as appropriate, should TMIA obtain any new or differing information responsive to the interrogatories.

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PDR ADOCK 05000289
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Licensee asks these interrogatories of TMIA in its capacity as lead intervenor on the issue of the Dieckamp mailgram. Licensee assumes that TMIA's response will reflect the collective knowledge of any intervenor who has an interest in, or desires to participate on, this issue. If Licensee is incorrect in its assumption, TMIA should promptly inform Licensee so that appropriate discovery requests can be provided to other intervenors as well.

A. Instructions

Any reference to Intervenor Three Mile Island Alert, Inc. (TMIA) shall be deemed to include all members of TMIA, and any other intervenor and its members on whose behalf TMIA is acting. When knowledge or information of TMIA is requested, such request includes knowledge or information of TMIA's members, employees, consultants, and unless privileged, its attorneys, and also includes the information of any other intervenor on whose behalf TMIA is acting and such intervenor's members, employees, consultants, or attorneys.

When identification of a document is requested, briefly describe the document (i.e., letter, memorandum, book, pamphlet, etc.) and state the following information as applicable to the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document. With respect to any interview or

deposition, state in addition to the information requested above the name and affiliation of the interviewer or deposer, and the date of the interview or deposition. With respect to any testimony, state in addition to the information requested above before whom and on what date the testimony was given.

The following definitions apply to each of the interrogatories:

1. "Document" means all writings and records of every type, including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, maps, bulletins, minutes, notes, speeches, articles, transcripts, voice recordings, and all other writings or recordings of any kind. "Document" shall also mean every copy of a document when such copy is not an identical duplicate of the original.
2. "Pressure spike" means the increase in the containment pressure that occurred at Three Mile Island, Unit 2, at approximately 1:50 p.m. on March 28, 1979, or the corresponding recordings on any strip recorder or other instrument, or the corresponding actuation of any alarm.
3. "Spray initiation" means the activation of containment sprays at Three Mile Island Unit 2 at approximately 1:50 p.m. on March 28, 1979.

B. Interrogatories

1. During the Prehearing Conference of September 17, 1984, TMIA indicated that Dr. Henry Myers had conducted some

investigations of his own. Tr 27400. Dr. Myers is the principal author of the Report Prepared by the Majority Staff of the House Committee on Interior and Insular Affairs, "Reporting of Information Concerning the Accident at Three Mile Island" (March 1981).

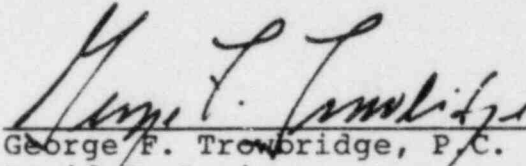
a. Identify any investigations that relate to the subject matter of the remanded hearing and that Dr. Myers conducted himself.

b. Identify any persons interviewed or deposed by Dr. Myers during the course of such investigation, the date on which such interview or deposition occurred, and the information that Dr. Myers obtained.

c. Identify any document which refers to or memorializes such investigations.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE


George F. Trowbridge, P.C.
David R. Lewis

Counsel for Licensee

Dated: October 1, 1984

October 1, 1984

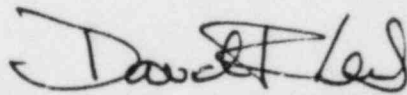
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Fifth Set of Interrogatories to Intervenor Three Mile Island Alert, Inc." were served this 1st day of October, 1984, by hand delivery to the parties identified with an asterisk and by deposit in the U.S. mail, first class, postage prepaid, to the other parties on the attached Service List.



David R. Lewis

Dated: October 1, 1984

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

Nunzio J. Palladino, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Thomas M. Roberts, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

James K. Asselstine, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Frederick Bernthal, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Lando W. Zeck, Jr., Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Gary J. Edles, Chairman
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
John H. Buck
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Christine N. Kohl
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Ivan W. Smith, Chairman
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Sheldon J. Wolfe
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Docketing and Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Jack R. Goldberg, Esq. (4)
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Thomas Y. Au, Esq.
Office of Chief Counsel
Department of Environmental
Resources
505 Executive House
P.O. Box 2357
Harrisburg, PA 17120

William T. Russell
Deputy Director, Division
of Human Factors Safety
Office of NRR
Mail Stop AR5200
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Henry D. Hukill
Vice President
GPU Nuclear Corporation
P.O. Box 480
Middletown, PA 17057

Mr. and Mrs. Norman Aamodt
R.D. 5
Coatesville, PA 19320

Ms. Louise Bradford
TMI ALERT
1011 Green Street
Harrisburg, PA 17102

*Joanne Doroshow, Esquire
The Christic Institute
1324 North Capitol Street
Washington, D.C. 20002

*Lynne Bernabei, Esq.
Government Accountability
Project
1555 Connecticut Avenue
Washington, D.C. 20036

Ellyn R. Weiss, Esq.
Harmon, Weiss & Jordan
2001 S Street, N.W., Suite 430
Washington, D.C. 20009

Michael F. McBride, Esq.
LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Suite 1100
Washington, D.C. 20036

Michael W. Maupin, Esq.
Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, VA 23212