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WRITERS DIRECT DIAL NUMBER

822-1474

October 4, 1984

Lynne Bernabei, Esquire
 Government Accountability
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 1555 Connecticut Avenue, N.W.
 Washington, D.C. 20036

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

Dear Lynne:

We received your response to Licensee's Third Set of Interrogatories and Third Request for Production (October 1, 1984). However, your response to Interrogatory No. 20 is inadequate. Interrogatory 20 asked TMIA to identify relevant documents of which TMIA had knowledge. Your answer, however, is improperly limited to documents in your possession or control.

In addition, we believe that you were incorrect in responding that you have in your possession or control no documents other than those listed in the interrogatory, the Gamble memorandum, and those previously identified by TMIA in its supplemental response to interrogatory No. 2 of Licensee's Second

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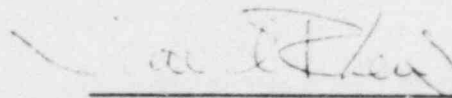
Lynne Bernabei, Esquire
October 4, 1984
Page 2

Set of Interrogatories. For example, during TMIA's recent deposition, you referred to and had in hand a transcript of an interview of John Herbein before the Kemeny Commission.

Finally, with respect to interviews, your supplemental response to interrogatory No. 2 of Licensee's Second Set of Interrogatories merely stated that you had some unspecified interviews conducted by GPU and some unspecified interviews conducted by the NRC in conjunction with NUREG-0600 and NUREG-0760. Interrogatory 20 seeks individual identification of each document.

Please review and supplement your response to Interrogatory 20 by October 9, 1984. If we do not receive a further response we will seek a Licensing Board order compelling response.

Sincerely,



David R. Lewis
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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