# SHAW PITTMAN POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

AOO M STREET, N. W. WASHINGTON, D. C. 20036

AMSAY D. POTTS, P.C.
TEUART L. PITTMAN, P.C.
EONGE F. TROWBRIDGE, P.C.
TEUHEN D. POTTS, P.C.
ERALD CHARNOFF, P.C.
HILLIP D. BOSTWICK, P.C.
I. TIMOTHY MANLON, P.C.
ECORGE M. ROGERS, JR., P.C.
IGEO A. LITTLE, P.C.
IGEO M. S. HINELANDER, P.C.
IGEO M. S. HINELANDER, P.C.
ESLIE A. NICHOLSON, JR., P.C.
IAY E. SILBERG, P.C.
IECORGE V. CHURCHILL, P.C.
IECORGE V. ALLEN, JR., P.C.
FRED DRASNER, P.C.
ETHALLY WEBSTER, P.C.
ERNEST GEBUKE, P.C.
CARLETOLS JONES, P.C.
THOMAS A. BAXTER, P.C.
DEALDON J. WEISEL, P.C.
J. THOMAS LENHART, P.C.
STEVEN L. MELTZER, P.C.
DEAN D. AULICK, P.C.
JOHN ENGEL, P.C.
JOHN ENGEL, P.C.
JOHN ENGEL, P.C.
C. THOMAS HICKS III, P.C.
C. CHOMAS HICKS III, P.C.
C. THOMAS HICKS III, P.C.
C. CHOMAS HICKS III, P.C.
CHARLES B. TEMKIN, P.C.

WASHINGTON, D. C. 2003 & WASHING, D. 2003 & WASHING, D. C. 2003 & WASHING, D. 2003 & W

(202) 822-1000

BORFET F CONN COUNSEL

DAVID J. CYNAMON
LACK A HORN\*
LOUISE A WATHEWS
SETH H HOOGASIAN
SHEILA MCC. HARVEY
DELISSA A RIDGWAY
KENNETH J HAUTMAN
PREDERICK L. KLEIN
FTEVEN P. PITLER
RICHARD J. PARRINO
ELLEN A FREDEL
ROBERT O. BOEHM
MARIEN DOLAND
THOMAS C. HILL
LOUANES HILLEY
LOUANES HILLEY
LOUANES HILLEY
HANDAM E. WADDEN
HANNAH E. M. HOEBERMAN
JUDITH A SANDLER
ANDREW D. ELLIS
RICHARD A. SAMP
THOMAS E. CROCKER, JR.
VICKI R. HARDING
PETER J. FERRARA
HELEN TORELLE
MENNA BOONE ROWAN\*\*
HELEN TORELLE
JOHN S. PILECKI\*
WENDELIN A. WHITE

EILEEN L BROWNELL

PAMELA H, ANDERSON
ALEXANDER D. TOMASZCZU
JEFFREY J. A. GIBBS
LAURENCE W. COHEN
DEREK W. LINDEN
SYLVIA M. LOTRECK
JEFFREY R. SNYDER\*
PHILIP D. PORTER
MICHAEL A. SWIGER
ELLEN SHERIFF
ANITA F. SAME
C. BOWDOIN TRAIN
JEFFREY W. KAMPELMAN
KENNETH A. GALLO
DAYID R. LEWIS
A. PATRICK LEIGHTON III\*
JEFFREY G. BERMAN
KENNETH D. AUEPBACH
ALAN D. WASSERMIAN
RICHARD K. A. BECKER
WILBERT WASSHINGTON II
DONGTHEA W. DICKERMAN
JONATMAN T. CAIN
DOUGLAS L. HILLEGOE\*
NOT ADMITTED IN DOUGLAS L. HILLEGOE\*

WRITER'S DIRECT DIAL NUMBER

(202)822-1215

+ ADMITTED IN VIRGINIA

November 15, 1984

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

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

Dear Bill:

Enclosed are affidavits to accompany Licensee's Answers to Union of Concerned Scientists' Fourth Set of Interrogatories and Requests for Production of Documents (September 23, 1984); Licensee's Answers to Union of Concerned Scientists' Fifth Set of Interrogatories and Requests for Production of Documents (October 3, 1984); Licensee's Answers to Union of Concerned Scientists' Sixth Set of Interrogatories and Requests for Production of Documents (October 11, 1984); and Licensee's Answers to Union of Concerned Scientists' Seventh Set of Interrogatories and Requests for Production of Documents (October 15, 1984).

8411190183 841115 PDR ADOCK 05000289 G PDR

Sincerely,

Deborah B. Bauser

cc: Service List

November 15, 1984

#### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

### AFFIDAVIT OF DEBORAH B. BAUSER

District of ) ss Columbia )

Deborah B. Bauser, being duly sworn according to law, deposes and says that she is counsel for GPU Nuclear Corporation, and that the answers to Interrogatories 6-1, 6-2 and 6-8, contained in "Licensee's Answers to Union of Concerned Scientists' Sixth Set of Interrogatories and Document Requests to General Public Utilities" are true and correct to the best of her information, knowledge and belief.

Deborah B. Bauser

Sworn to and subscribed to before me this 15th day of November, 1984.

Notary Public

My Commission expires 4-30-8:

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

## AFFIDAVIT OF RICHARD PHILLIPE COE

District ) of ) ss Columbia )

Dr. Richard P. Coe, being duly sworn according to law, deposes and says that he is Director of Training and Education for GPU Nuclear Corporation, and that the answers to Interrogatories 7-11 through 7-13, contained in "Licensee's Answers to Union of Concerned Scientists' Seventh Set of Interrogatories and Document Requests to General Public Utilities" are true and correct to the best of his information, knowledge and belief.

Dr. Richard P. Coe

Sworn to and subscribed to before me this <u>Dl</u> day of October.

Notary Public

му	Commission	expires	7	IM	87		
			The second second second second	A			

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

# AFFIDAVIT OF RICHARD PHILLIPE COE

County of Morris .. State of New Jersey )

Dr. Richard P. Coe, being duly sworn according to law, deposes and says that he is Director of Training and Education for GPU Nuclear Corporation, and that the answers to Interrogatories 5-12 and 5-13, contained in "Licensee's Answers to Union of Concerned Scientists' Fifth Set of Interrogatories and Document Requests to General Public Utilities" are true and correct to the best of his information, knowledge and belief.

Sworn to and subscribed to before me this 3 day of October.

CAROL J. SCHINSKI

Notary Public of New Jersey

My Commission expires My Commissio Sept. 29, 1967

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

## AFFIDAVIT OF BRUCE P. LEONARD

County of Dauphin ) ss State of Pennsylvania )

Bruce P. Leonard, being duly sworn according to law, deposes and says that he is Operator Training Manager, TMI, and that the answers to Interrogatories 4-1 through 4-3, 4-5, 4-6, 4-11 and 4-12, contained in "Licensee's Answers to Union of Concerned Scientists' Fourth Set of Interrogatories and Document Requests to General Public Utilities" are true and correct to the best of his information, knowledge and belief.

Auce 1. Leonard

Sworn to and subscribed to before me this today of October.

Notary Publish Bony

My Commission expires Que 17,1985

MICOLETOWN BORD DECEMEN COUNTY
MY COMMISSION COUNTY
MY COMMISSION CONTRACTOR TO THE TOTAL TO THE TOTAL TOTAL

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

METROPOLITAN EDISON COMPANY

(Three Mile Island Nuclear Station, Unit No. 1)

Docket No. 50-289 SP (Restart-Management Remand)

# AFFIDAVIT OF BRUCE P. LEONARD

County of Dauphin )
State of Pennsylvania )

Bruce P. Leonard, being duly sworn according to law, deposes and says that he is Operator Training Manager, TMI, and that the answers to Interrogatories 5-1 through 5-11, contained in "Licensea's Answers to Union of Concerned Scientists' Fifth Set of Interrogatories and Document Requests to General Public Utilities" are true and correct to the best of his information, knowledge and belief.

Bruce P. Leonard

Sworn to and subscribed to before me this war day of October.

Hotary Public

Mam .

My Commission expires Que 17, 1985

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

# AFFIDAVIT OF BRUCE P. LEONARD

County of Dauphin ) ss State of Pennsylvania )

Bruce P. Leonard, being duly sworn according to law, deposes and says that he is Operator Training Manager, TMI, and that the answers to Interrogatory 6-7, contained in "Licensee's Answers to Union of Concerned Scientists' Sixth Set of Interrogatories and Document Requests to General Public Utilities" are true and correct to the best of his information, knowledge and belief.

Bruce P. Leonard

Sworn to and subscribed to before me this day of October.

State you Bour

My Commission expires Que 17, 1985

DARLA JEAN BERRY HOTARY UBLIC MIUDLETOWN BORD DAUPHIN COUNTY MY COMMISSION SYPIRES JUNE 17 1985

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matte	r of	)
	EDISON COMPANY	) Docket No. 50-289 SP (Restart-Management Remand)
(Three Mile Station, Uni	Island Nuclear t No. 1)	)
	AFFIDAVIT OF	BRUCE P. I EONARD
District of Columbia		ss

Bruce P. Leonard, being duly sworn according to law, deposes and says that he is Operator Training Manager, TMI, and that the answers to Interrogatories 7-1 through 7-10, contained in "Licensee's Answers to Union of Concerned Scientists' Seventh Set of Interrogatories and Document Requests to General Public Utilities" are true and correct to the best of his information, knowledge and belief.

Bruce P. Leonard

Sworn to and subscribed to before me this 31 day of October.

Notary Public

My Commission expires 7/14/87

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

## AFFIDAVIT OF MICHAEL J. ROSS, SR.

County of Dauphin ) ss State of Pennsylvania )

Michael J. Ross, Sr., being duly sworn according to law, deposes and says that he is Manager, Plant Operations, and that the answers to Interrogatories 4-1 through 4-12, contained in "Licensee's Answers to Union of Concerned Scientists' Fourth Set of Interrogatories and Document Requests to General Public Utilities" are true and correct to the best of his information, knowledge and belief.

Michael J. Ross, Sr.

Sworn to and subscribed to before me this 4th day of October, 1984.

Notary Public Notary Public Notary Public Notary Public Notary Public Notary No

# 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. Zech 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

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
1:555 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

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