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April 4, 1986

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Joanne Doroshow, Esquire
Three Mile Island Alert, Inc.
315 Peffer Street
Harrisburg, PA 17102

Dear Ms. Doroshow:

This will summarize the procedures we agreed upon today by telephone in response to your request to address Licensee's first round of interrogatories with some degree of informality. I stated my position that we would attempt to work out some type of less formal arrangement, but with the understanding that TMIA's responses would have to be appropriately documented for the record.

With this in mind, we agreed that, in lieu of TMIA's responding in writing to that set of interrogatories, GPU's attorneys will meet with you Monday, April 7, at our offices in Washington at 1:00 p.m. We will discuss each interrogatory for the purpose of obtaining the requested information orally. The meeting will be transcribed so that each of us has a record of what was said, but it will not be in the nature of a deposition.

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SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Joanne Doroshow, Esquire

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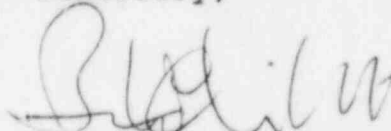
April 4, 1986

Following Monday's meeting, Licensee will file a second set of interrogatories which will characterize your oral responses to the first set, and ask if you agree with the characterization. If you do not, you will be asked to explain how TMIA's position differs from the characterization. While this approach to discovery is novel to us, we think it may satisfy the requirement that your interrogatory responses be documented. If indicated, the second set of interrogatories may also include followup questions based upon the information we received at the meeting, similar to what might have been done had the first set been responded to in writing.

This agreement was made in the spirit of the Licensing Board's direction to the parties that they attempt to implement informal methods to expedite the discovery process.

We will also have for you on Monday the documents that you requested today.

Sincerely,



Bruce W. Churchill

cc: Service List (attached)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
GPU NUCLEAR CORPORATION, et al.) Docket Nos. 50-289-OLA-1 and
(Three Mile Island Nuclear Station,) 50-289-OLA-2
Unit No. 1))

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