

April 18, 1986

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USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ADMINISTRATIVE LAW JUDGE

OFFICE OF SECRETARY
DOCKETING SERVICE
BRANCH

In the Matter of)	
)	
GENERAL PUBLIC UTILITIES)	
NUCLEAR)	Docket No. 50-289 (CH)
)	
(Three Mile Island Nuclear)	
Station, Unit No. 1))	

SUPPLEMENTAL RESPONSE OF GPU NUCLEAR CORPORATION
TO NRC STAFF'S FIRST INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS TO GPU NUCLEAR CORPORATION

Supplemental Response to Interrogatory No. 3: The GPU Nuclear representatives that formed an opinion about Mr. Husted's testimony before the Special Master on the basis of observing Mr. Husted testify were GPU Nuclear's counsel (Mr. John Wilson and Mr. Ernest Blake).

Supplemental Response to Interrogatory No. 4: Mr. Paul Christman, who attended the July 28, 1981 interview with Mr. Husted, does remember attending the interview. He has reviewed his notes of the interview, and believes that they are correct, although he has only a limited independent recollection of the interview itself. Specifically, Mr. Christman recalls that he was at the interview, he believes he recalls where the interview took place, he recalls taking notes, and he remembers the

general subject-matter that was discussed. Mr. Christman also thinks he independently recalls that Mr. Husted would not answer one or more questions. Mr. Christman does not remember the specific questions and answers that were stated during the interview.

Present or former GPU or GPU Nuclear personnel who were consulted in order to answer the NRC Staff's interrogatories are: R. Long, P. Clark, H. Dieckamp, P. Christman, S. Newton, and R. Arnold.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By: Deborah B. Bauser

Deborah B. Bauser
Scott E. Barat

Counsel for GPU Nuclear Corporation

1800 M Street, N.W.
Washington, D.C. 20036
(202) 822-1000

Dated: April 18, 1986

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Supplemental Response of GPU Nuclear Corporation to NRC Staff's First Interrogatories and Request for Production of Documents to GPU Nuclear Corporation" dated April 18, 1986 were served on the following by deposit in the U.S. mail, first class, postage prepaid, this 18th day of April, 1986.

Morton B. Margulies, Esquire
Administrative Law Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

George E. Johnson, Esquire
Office of Executive Legal
Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

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

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

Ms. Louise Bradford
Three Mile Island Alert
1011 Green Street
Harrisburg, Pennsylvania 17102

Michael Maupin, Esq.
Hunton & Williams
P.O. Box 1535
Richmond, VA 23212

Deborah B. Bauser
Deborah B. Bauser