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J. PATRICK HICKEY, P.C.

July 6, 1987

BY MESSENGER

George E. Johnson, Esq.  
U.S. Nuclear Regulatory Commission  
7735 Old Georgetown Pike  
Bethesda, MD 20814

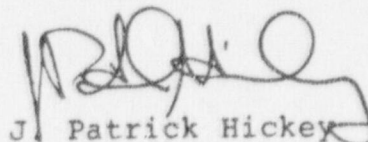
Dear Mr. Johnson:

Enclosed per our earlier discussion is a revision of your proposed stipulations to obviate the need for the appearance of A. Bill Beach as a staff witness. During Mr. Parks' deposition in California, you advised that you may wish to call Mr. Beach as a rebuttal witness under some circumstances. We wish to explore that subject further with you, to determine whether notwithstanding the stipulation we may need to depose Mr. Beach.

You indicated that some areas of the proposed stipulations would not be covered by Mr. Beach's testimony at a hearing since he lacks first-hand knowledge of some of the events described, but would, absent a stipulation, be addressed in the testimony of Mr. Weibe of the NRC, previously identified as a staff witness. We have agreed in the enclosed revision to stipulate to those areas as well, but would still think it necessary to have Mr. Weibe called to testify, to supplement the areas covered by the stipulation.

Please call me after you have reviewed the enclosure so we can attempt to resolve this matter. I will be available to meet with you this week if that will facilitate the process.

Sincerely,

  
J. Patrick Hickey

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cc: (w/o enclosure)  
Service List

0502

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