

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WESTINGHOUSE ELECTRIC COMPANY,)

Plaintiff,)

v.)

UNITED STATES OF AMERICA, UNITED)
STATES DEPARTMENT OF ENERGY, and)
NUCLEAR REGULATORY COMMISSION,)

Defendants.)

CIVIL ACTION NO. 00-CV-895

Judge Gary L. Lancaster

FEDERAL DEFENDANTS' INITIAL DISCLOSURES

Federal Defendants United States of America, United States Department of Energy ("DOE"), and United States Nuclear Regulatory Commission ("NRC"), by and through their attorney, Steven E. Rusak, Trial Attorney, United States Department of Justice, submit their initial disclosures pursuant to Federal Rule of Civil Procedure Rule 26(a)(1).

1. List the name and, if known, the last address and telephone number of each individual, other than the Defendant, likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information.

RESPONSE:

Federal Defendants believe that the following person has relevant information:

Joseph C. Szurley, Senior Technologist
Bechtel Bettis, Inc.
Bettis Atomic Power Laboratory
P.O. Box 79
West Mifflin, PA 12122-0079
Tel: (412) 476-6696

Mr. Szurley was employed at the Bettis Atomic Power Laboratory and is believed to have personal knowledge regarding a purchase order that Bettis placed with the Blairsville Facility in

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or about 1956, involving the manufacture of fuel elements using natural uranium. It is believed that Mr. Szurley made several visits to the Blairsville Facility to observe work being performed under the Bettis purchase order.

2. Give a copy of, or a description by category and location of, all documents, data compilations, and tangible things in your client's possession, custody or control that are relevant to disputed facts alleged with particularity in the pleadings.

RESPONSE:

Federal Defendants previously produced documents numbered US001 through US579 to Plaintiff.

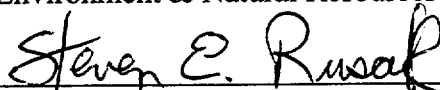
3. The existence and contents of any insurance agreement under which any person or entity carrying on an insurance business may be liable to satisfy part or all of the judgment that may be entered in the action, making available such agreement for inspection and copying.

RESPONSE: Not applicable, the United States is self-insured.

Wherefore, the Federal Defendants submit their initial disclosures.

Respectfully submitted,

JOHN C. CRUDEN
Acting Assistant Attorney General
Environment & Natural Resources Division



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DATE: November 19, 2001

CERTIFICATE OF SERVICE

I, Steven E. Rusak, do hereby certify that the foregoing "Federal Defendants' Initial Disclosures," were served by placing a true and correct copy in the United States mail, postage prepaid, and addressed to the following:

Steven Baicker-McKee, Esq.
Scott A. Wright, Esq.
Babst, Calland, Clements & Zomnir, P.C.
Two Gateway Center, 8th Floor
Pittsburgh, PA 15222

on this 19th day of November, 2001.

Steven E. Rusak