

# SHAW, PITTMAN, POTTS & TROWBRIDGE

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EDWARD D. YOUNG, III

Administrative Judge  
Gary L. Milhollin  
Atomic Safety & Licensing Board  
1815 Jefferson Street  
Madison, Wisconsin 53711

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



Dear Judge Milhollin:

Enclosed is a copy of a Certificate of Service covering Licensee discovery responses which have been delivered over the last two days.

Enclosed as well are copies of cover letters for each response, which may not have been distributed to all other parties along with their copies of the substantive discovery responses.

Respectfully submitted,

*Ernest L. Blake, Jr.*  
Ernest L. Blake, Jr.  
Counsel for Licensee

ELB/tjc  
Encls.

cc: Attached Service List

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5/1*

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PDR ADOCK 05000289  
G PDR

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Special Master

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

CERTIFICATE OF SERVICE

I hereby certify that copies of the following listed documents were hand delivered on October 26, 1981, to the Aamodts, to TMIA, and to the Commonwealth of Pennsylvania; were hand delivered to Lucinda Swartz at the offices of the Nuclear Regulatory Commission in Bethesda, Maryland, on October 27, 1981; and were sent by Federal Express to Special Master Milhollin on October 27, 1981, for delivery on October 28, 1981: Licensee's Response to Aamodt's Second Set Of Discovery Requests Of Licensee In Reopened Hearing Of Cheating Incident (As Modified By Agreement), Licensee's Response to Aamodt's Third Set Of Discovery Requests Of Licensee In Reopened Hearing Of Cheating Incident, Licensee's Supplemental Response To Aamodt's First Set of Discovery Requests Of Licensee In Reopened Hearing Of Cheating Incident (As Modified By Agreement And By Rulings Of The Special Master), Licensee's Response to Aamodt's Additional Interrogatories To NRC Staff And Licensee In Reopened Hearing Of Cheating Incident (As Modified By Agreement and Rulings Of The Special Master), Licensee's Response to TMIA's First Set of Interrogatories Addressed To Licensee (As Modified By Agreement),

Licensee's Supplemental Response to TMIA's First Set of Discovery Requests Of Licensee In Reopened Hearing Of Cheating Incident (As Modified By Agreement), and Licensee's Supplemental Response To The Commonwealth Of Pennsylvania's Request For Documents (As Modified By Agreement).

*Ernest L. Blake, Jr.*

---

Ernest L. Blake, Jr.  
Counsel for Licensee

DATED: October 27, 1981.

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Ms. Louise Bradford  
TMI ALERT  
1011 Green Street  
Harrisburg, PA 17102

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

Dear Louise:

I enclose copies of Licensee's responses to TMIA's first set of interrogatories dated October 8, 1981, and supplemental responses to TMIA's earlier discovery requests. Related affidavits will be supplied later.

Sincerely,

*Emie*

Ernest L. Blake, Jr.  
Counsel for Licensee

ELB/tjc  
Encls.

cc: Reopened Hearing Discovery  
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Mrs. Marjorie M. Aamodt  
R. D. 5  
Coatesville, PA 19320

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

Dear Marjorie:

I enclose copies of Licensee's responses to Aamodt's Second Set of Discovery Requests Of Licensee In Reopened Hearing of Cheating Incident (As Modified By Agreement) of October 16, 1981, and supplemental responses to earlier Aamodt discovery requests. Also enclosed is Licensee's response to Aamodt Additional Interrogatories to NRC Staff and Licensee In Reopened Hearing of Cheating Incident (As Modified By Agreement and Rulings of the Special Master) dated October 16, 1981, and Licensee's response to Aamodt's Third Set of Discovery Requests of Licensee In Reopened Hearing Of Cheating Incident dated October 16, 1981.

Related affidavits will be supplied later.

Sincerely,

*Emil*  
Ernest L. Blake, Jr.  
Counsel for Licensee

ELB/tjc  
Encls.

cc: Reopened Hearing Discovery  
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In the Matter of  
Metropolitan Edison Company  
(Three Mile Island Nuclear Station, Unit No. 1)  
Docket No. 50-289 SP (Restart)

Dear Bob:

Enclosed are supplemental responses to the Commonwealth's  
discovery requests of Licensee dated October 2, 1981.

Sincerely,

*Emil*

Ernest L. Blake, Jr.  
Counsel for Licensee

ELB/tjc  
Encl.

cc: Reopened Hearing Discovery  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Special Master

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METROPOLITAN EDISON COMPANY	)	Docket No. 50-289 SP
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(Three Mile Island Nuclear	)	(Restart)
Station, Unit No. 1)	)	

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