



BURT C. PROOM, CPCU  
President

JOHN E. HARWARD  
Vice President - Claims

April 14, 1983

50-219

Mr. Jerome Saltzman  
Assistant Director  
State and Licensee Relations  
Office of State Programs  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Abstract #102  
Jersey Central Power & Light Company and  
General Public Utilities  
Re: Jeanne F. Laird & James K. Letellair, et al.  
D/O: March 4, 1982

Dear Mr. Saltzman:

Attached find a copy of a Summons and Complaint filed against our policyholders Jersey Central Power and Light Company and General Public Utilities.

My understanding is that this suit involves a claim by two local residents who participated in an emergency drill at the Oyster Creek nuclear facility in Forked River, New Jersey. It is our understanding that the two individuals who have brought this suit, together with their spouses, were wearing film badges and their recorded exposures were minimal. Their documented exposure records are presently being developed by the policyholder.

We have very little additional information on the case at this time but can advise you that the loss appears to be covered under our nuclear liability policy and we have, therefore, referred the suit to Attorney David Novack of the law firm of Budd, Larner, Kent, Gross, Picillo & Rosenbaum, Newark, New Jersey, with the request that he file an appearance on behalf of our policyholders and do whatever is necessary to fully protect their interests in this litigation.

Very truly yours,

*J. E. Harward*  
J. E. Harward  
Vice President, Claims

8304180576 830414  
PDR ADOCK 05000219  
J PDR

JEH/pbj  
Enclosure

M012

Rec'd and Logged  
April 6, 1983-53

Attorney(s): LEVINSON, CONOVER, AXELROD & WHEATON, ESQS.

Office Address & Tel. No.: Medi-Plex Building, 98 James Street, Edison, NJ 08820  
Attorney(s) for Plaintiff(s) (201) 494-2727

Plaintiff(s)

JEANNE F. LAIRD and DWIGHT LAIRD, her husband;  
and JAMES K. LETELLIER and DEBRA LETELLIER, his  
wife,

vs.

Defendant(s)

JERSEY CENTRAL POWER & LIGHT COMPANY, a New  
Jersey Corporation; and GENERAL PUBLIC UTILITIES  
COMPANY, a Pennsylvania Corporation,

SUPERIOR COURT  
OF NEW JERSEY

LAW DIVISION

MIDDLESEX COUNTY

Docket No. L-017720-83

CIVIL ACTION

Summons

The State of New Jersey, to the Above Named Defendant(s): JERSEY CENTRAL POWER & LIGHT  
CO.

YOU ARE HEREBY SUMMONED in a Civil Action in the Superior Court of New Jersey, instituted by  
the above named plaintiff(s), and required to serve upon the attorney(s) for the plaintiff(s), whose name  
and office address appears above, an answer to the annexed complaint within 20 days after the  
service of the summons and complaint upon you, exclusive of the day of service. If you fail to answer,  
judgment by default may be rendered against you for the relief demanded in the complaint. You shall  
promptly file your answer and proof of service thereof in duplicate with the Clerk of the Superior Court,  
P. O. Box 1300, Trenton, New Jersey 08625, in accordance with the rules of civil practice and procedure.

An individual who is unable to obtain an attorney may communicate with the New Jersey State  
Bar Association by calling toll free 800-792-8315 (within New Jersey) or 609-394-1101 (from out of state).  
You may also communicate with a Lawyer Referral Service or, if you cannot afford to pay an attorney, call a  
Legal Services Office. The phone numbers for the county in which this action is pending are: Lawyer Referral  
Service 328-0053, 494-2929, Legal Services Office 249-7600. Persons who  
reside in New Jersey may also call their county Lawyer Referral Service 267-5882  
or Legal Services Office 285-6391.

Dated: March 31, 1983

W. Lewis Bambrick

Clerk of the Superior Court  
W. Lewis Bambrick

Name of defendant to be served: JERSEY CENTRAL POWER

Address for service:

& LIGHT COMPANY

c/o Robert Brokaw, Registered Agent

Madison Avenue & Punch Bowl Road

Morristown, New Jersey

## Levinson Conover Axelrod & Wheaton

A Professional Corporation

98 James Street, Medi-Plex Building  
Edison, New Jersey 08817  
(201)494-2727

Attorneys For Plaintiffs

JEANNE F. LAIRD and DWIGHT LAIRD,	:	
her husband; and JAMES K. LETELLIER:	:	SUPERIOR COURT OF NEW JERSEY
and DEBRA LETELLIER, his wife,	:	LAW DIVISION-MIDDLESEX COUNTY
	:	DOCKET NO. L-017720-83
Plaintiffs,	:	
vs	:	
JERSEY CENTRAL POWER & LIGHT	:	Civil Action
COMPANY, a New Jersey Corporation;	:	
and GENERAL PUBLIC UTILITIES COM-	:	
PANY, a Pennsylvania Corporation,	:	
Defendants.	:	COMPLAINT

The Plaintiffs, JEANNE F. LAIRD and DWIGHT LAIRD, her husband, residing at 2184 Hollywood Drive, Township of Forked River and State of New Jersey; and JAMES K. LETELLIER and DEBRA LETELLIER, his wife, residing at 2519 Smith Road, Bamber Lake, Lacey Township, State of New Jersey, complaining of the defendants herein say that:

### FIRST COUNT

1. On or about the 4th day of March, 1982, the plaintiff,

operated by the defendants and known as the Forked River Nuclear Fuel & Power Plant located in Forked River, New Jersey.

2. The aforesaid defendants were in the business of producing electrical energy through the medium of nuclear devices and fuel.

3. As a direct and proximate result of the negligence of the defendants through their agents, servants, and/or employees, the plaintiff, JEANNE F. LAIRD, was allowed to be exposed to destructive radiation from a nuclear device or from some other impregnated material, whereby said plaintiff was caused to suffer great physical harm, emotional anguish, pain, and permanent injury.

4. The plaintiff will incur the effects of this negligent act or acts of the defendants for the duration of her life and will further incur medical expenses for her well-being in the future.

WHEREFORE, the plaintiff, JEANNE F. LAIRD, demands judgment against the defendants jointly, severally, and/or in the alternative.

#### SECOND COUNT

1. The plaintiff, DWIGHT LAIRD, repeats the allegations contained in the First Count as if same were more fully set forth at length herein and made a part hereof.

2. At the time of this accident and at the present time, he is the husband of Jeanne F. Laird and in such capacity he is responsible for her medical expenses and well-being. Further, as a direct and proximate result of the negligence of these defendants through their agents, servants, and/or employees, Dwight Laird has been caused to be deprived of and will continue to be

deprived in the future of the love, services, and consortium of his wife.

WHEREFORE, the plaintiff, DWIGHT LAIRD, demands judgment against the defendants jointly, severally, and/or in the alternative.

#### THIRD COUNT

1. The plaintiff, JAMES K. LETELLIER repeats the allegations contained in the First Count as if same were more fully set forth at length herein and made a part hereof.

2. At the same time and place aforementioned, he was also an invitee upon the premises owned and operated by the defendants and known as the Forked River Nuclear Fule & Power Plant.

3. As a direct and proximate result of the negligence of the defendants through their agents, servants, and/or employees, the plaintiff, JAMES K. LETELLIER, was allowed to be exposed to destructive radiation from a nuclear device or from some other impregnated material, whereby said plaintiff was caused to suffer great physical harm, emotional anguish, pain, and permanent injury.

4. The plaintiff will incur the effects of this negligent act or acts of the defendants for the duration of his life and will further incur medical expenses for his well-being in the future.

WHEREFORE, the plaintiff, JAMES K. LETELLIER, demands judgment against the defendants jointly, severally, and/or in the alternative.

#### FOURTH COUNT

1. The plaintiff, DEBRA LETELLIER, repeats the allegations contained in the Third Count as if same were more fully set

forth at length herein and made a part hereof.


2. At the time of this accident and at the present time, she is the wife of James K. Letellier. As a direct and proximate result of the negligence of these defendants through their agents, servants, and/or employees, Debra Letellier has been caused to be deprived of and will continue to be deprived in the future of the love, services, and consortium of her husband.

WHEREFORE, the plaintiff, DEBRA LETELLIER, demands judgment against the defendants jointly, severally, and/or in the alternative.

PLEASE TAKE NOTICE that the Plaintiffs demand a trial by jury pursuant to Rule 4:35-1.

LEVINSON, CONOVER, AXELROD &  
WHEATON, ESQS.  
Attorneys for Plaintiffs

BY:

  
ALFRED A. LEVINSON

DATED: March 15, 1983