



BURT C. PROOM, CPCU  
President

JOHN E. HARWARD  
Vice President - Claims

*Docket  
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OCC*

*50363*

July 20, 1983

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 and  
James K. Letellier, et al.  
Suit Docket #L-036088-83

Dear Mr. Saltzman:

This will serve as a follow-up to our report to you on April 18, 1983 on the captioned matter.

An amended complaint, copy attached, has now been filed in New Jersey, Middlesex Superior Court by Jeanne F. Laird, et al. and a companion suit, copy attached, has also been filed by Mary Ginda and Brian Keene, et al., in the same court, and alleging injuries resulting from identical radiation exposures.

We have again referred both suits to Attorney David Novack, a member 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 policyholder and do whatever is necessary to protect their interests in this matter.

Very truly yours,

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

JEH/pbj  
Enclosures

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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. LEPELLIER and DEBRA LEPELLIER, his  
wife,

*Defendant(s)*

JERSEY CENTRAL POWER & LIGHT COMPANY, a New Jersey Corporation; GENERAL PUBLIC UTILITIES COMPANY, A Pennsylvania Corporation; and GPU NUCLEAR CORPORATION, a New Jersey Corporation.

vs.

SUPERIOR COURT  
OF NEW JERSEY

LAW DIVISION

MIDDLESEX COUNTY

Docket No. 1: 017720-B3

CIVIL ACTION

**Summons**

The State of New Jersey, to the Above Named Defendant(s): GPU NUCLEAR CORPORATION

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 30 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 828-0053, 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: June 24, 1983

*W. Lewis Bambrick*

Clerk of the Superior Court

W. Lewis Bambrick

Name of defendant to be served: GPU NUCLEAR CORPORATION  
Address for service: c/o H.M. Graydon,  
Registered Agent  
100 Interpace Parkway  
Parsippany, 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, ) SUPERIOR COURT OF NEW JERSEY,  
her husband and JAMES K. LETELLIER ) LAW DIVISION, MIDDLESEX COUNTY  
and DEBRA LETELLIER, his wife, )

Plaintiffs, )

DOCKET NO. 1: 017720-83

vs. )

AMENDED COMPLAINT

JERSEY CENTRAL POWER & LIGHT )  
COMPANY, a New Jersey Corporation;  
GENERAL PUBLIC UTILITIES COMPANY )  
A Pennsylvania Corporation and )  
GPU NUCLEAR CORPORATION, A New )  
Jersey Corporation )

Defendants. )

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 Jeanne F. Laird, was an invitee upon the premises owned and 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 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 on this count.

#### SECOND COUNT

1. The plaintiff, Dwight Laird, repeats the allegations contained in the First Count as if the same were set forth more fully herein and made 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 defendnats 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 the 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 Fuel & 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 wellbeing in the future.

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

### FOURTH COUNT

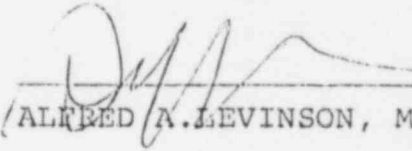
1. The plaintiff, Debra Letellier, repeats the allegations contained in the Third Count as if same were more fully set forth at length herein and made a part hereof.

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 trial by jury pursuant to Rule 4:35-1.

LEVINSON, CONOVER, AXELROD & WHEATON  
Attorneys for plaintiffs



ALFRED A. LEVINSON, Member of firm

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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)

MARY GINDA and EDWARD GINDA, her husband; and  
BRIAN KEENE,

SUPERIOR COURT  
OF NEW JERSEY

LAW DIVISION

MIDDLESEX COUNTY

vs.

Docket No. L-036088-83

Defendant(s)

JERSEY CENTRAL POWER & LIGHT COMPANY, a New Jersey Corporation; GENERAL PUBLIC UTILITIES COMPANY, A Pennsylvania Corporation; and GPU NUCLEAR CORPORATION, a New Jersey Corporation.

CIVIL ACTION

**Summons**

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

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 828-0053, 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: June 24, 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

MARY GINDA and EDWARD GINDA  
her husband and BRIAN KEENE

Plaintiffs,

vs.

JERSEY CENTRAL POWER & LIGHT  
COMPANY, a New Jersey Corpora-  
tion, GENERAL PUBLIC UTILITIES  
COMPANY, A Pennsylvania Corpora-  
tion and GPU NUCLEAR CORPORATION  
a New Jersey Corporation

Defendants.

SUPERIOR COURT OF NEW JERSEY,  
LAW DIVISION, MIDDLESEX COUNTY

DOCKET NO. L-036088-83

Civil Action

COMPLAINT

The plaintiffs, MARY GINDA and EDWARD GINDA, her husband residing at 632 Williams Ave., Forked River, New Jersey and BRIAN KEENE, residing at 106 Parker Ave., Forked River, New Jersey complaining of the defendnats herein say that:

FIRST COUNT

1. On or about the 4th day of March, 1982, the plaintiff, Mary Ginda was an invitee upon the premises owned and 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, Mary Ginda, 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 wellbeing in the future.

WHEREFORE, the plaintiff, Mary Ginda, demands judgment against the defendants jointly, severally and/or in the alternative on this count.

#### SECOND COUNT

1. The plaintiff, Edward Ginda, repeats the allegations contained in the First Count as if the same were set forth more fully herein and made part hereof.

2. At the time of this accident and at the present time, he is the husband of Mary Ginda 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, Edward Ginda, 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, Edward Ginda demands judgment against the defendants jointly, severally and/or in the alternative.

THIRD COUNT

1. The plaintiff Brian Keene repeats the allegations contained in the First Count as if the same were more fully set forth 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 Fuel & Power Plant.

3. As a direct and proximate result of the negligence of the defendants through their agents, servants and/or employees, the plaintiff, Brian Keene, 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.

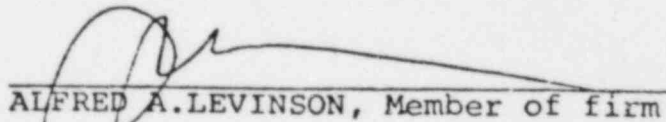
4. The plaintiff will incur the effects of this negligent act or acts of the defendants for the duration of his life and will further incur medical expenses for his well being in the future.

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

Take Notice that the plaintiffs pursuant to the rules demand trial by jury.

LEVINSON, CONOVER, AXELROD & WHEATON,  
Attorneys for plaintiffs

Dated; June 7, 1983

  
ALFRED A. LEVINSON, Member of firm