

UCS - October 16, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

UCS' SECOND NOTICE OF DEPOSITIONS TO NRC STAFF

Pursuant to 10 C.F.R. § 2.720(h)(2)(i), the Union of Concerned Scientists hereby gives notice of its intention to take depositions of the following persons:

1. The NRC Staff psychologist referred to in the letter of October 10, 1984, from Mary E. Wagner, Esquire, to William S. Jordan, III, Esquire.

She should bring with her the notes referred to in Ms. Wagner's letter, as well as any other notes in her possession or control that relate in any way to reactor operators or operator training at Three Mile Island.

2. All persons who were involved in the preparation of the review of the GPU licensed Operator Regualification and Replacement program described at NUREG-0680, Supp. 5, p. 7-13, including those who did the reviews and evaluations and those, if different, who drafted the relevant sections of the written review.

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They should bring with them all documentation (including notes, drafts and final reports and input to reports, memoranda, interview notes, evaluations, and all other documents) of their review, including, but not limited to, the records of the six licensed operators whose records were reviewed and the notes and/or transcripts of the interviews with two licensed operators. They should also bring with them their resumes and statement of qualifications.

3. All persons involved in the preparation of the portions of the SALP Report of April 2, 1984, described at NUREG-0680, Supp. 5, p. 7-14, related to GPU training, including those who did the reviews and evaluations and those, if different, who drafted the relevant sections of the SALP.

They should bring with them all documentation of that review, including but not limited to notes, draft and final reports, and input to reports, memoranda, interview notes, evaluations, and any and all other documentation. They should also bring with them their resumes and statement of qualifications.

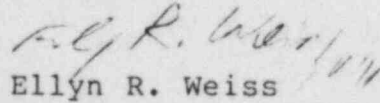
4. All persons involved in the preparation of the Operational Readiness Evaluation of TMI-1 licensed personnel (February 8 and 9, 1984), described at NUREG-0680, Supp. 5, p. 7-14, including those who did the reviews, interviews, and evaluations, and those, if different, who drafted the evaluation.

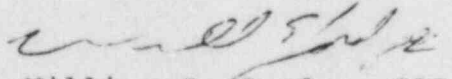
They should bring with them all documentation of that review, including but not limited to notes, draft and final reports, and input to reports, memoranda, interview notes, evaluations, and any and all other documentation. This includes, but is not limited to, the notes and evaluations of interviews with 26 licensed operators, the questions asked in those interviews, and the answers given. They should also bring with them their resumes and statement of qualifications.

Except as otherwise agreed, these depositions will be taken in the order stated above at the offices of UCS' attorneys, Harmon, Weiss, & Jordan, 2001 S Street, N.W., Suite 430, Washington, D.C. The first deposition will begin at 10:00 a.m.

on Monday, October 29, 1984, and the depositions will continue thereafter until they are completed.

Respectfully submitted,


Ellyn R. Weiss


William S. Jordan, III

HARMON, WEISS, & JORDAN
2001 S Street, N.W.
Suite 430
Washington, D.C. 20009
(202) 328-3500

Dated: October 16, 1984

October 16, 1984

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of the UNION OF CONCERNED SCIENTISTS' NOTICE OF DEPOSITION OF CERTAIN GPU PERSONNEL and UNION OF CONCERNED SCIENTISTS' SECOND NOTICE OF DEPOSITIONS TO NRC STAFF, October 16, 1984, were served on the following by deposit in The United States mail, first class, postage prepaid, on October 16, 1984.

William S. Jordan, III



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SERVICE LIST

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* Hand delivered