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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBefore the Atomic Safety and Licensing Board

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

LICENSEE'S RESPONSE TO INTERVENOR THREE MILE ISLAND ALERT'S
FIFTH SET OF INTERROGATORIES TO GENERAL PUBLIC UTILITIES

On October 1, 1984, the last day on which interrogatories could be filed, Intervenor Three Mile Island Alert ("TMIA") filed its Fifth Set of Interrogatories to Licensee. These Interrogatories purportedly relate to the remanded proceeding on the Dieckamp mailgram. However, to a great extent they not only ignore the scope of this proceeding, but also flaunt the Licensing Board's Memorandum and Order Ruling on First GPU-TMIA Discovery Dispute (August 31, 1984), which established the permissible scope of inquiry during discovery.

As the Appeal Board stated in remanding the Restart proceeding for further hearings on the Dieckamp mailgram, "the scope of the Board's inquiry is relatively limited."

Metropolitan Edison Co. (Three Mile Island Nuclear Generating Station, Unit No. 1), ALAB-772, 19 N.R.C. _____, slip op. at 134 (May 24, 1984). The inquiry merely addresses the accuracy of the Dieckamp mailgram and Mr. Dieckamp's knowledge of whether anyone interpreted the pressure spike in terms of core damage. It does not address the withholding of information in general. Tr. 27,363. Nevertheless, TMIA persists in filing unfocused interrogatories on topics totally unrelated to this remanded proceeding. Licensee objects to TMIA's flagrant attempt to expand this proceeding to relitigate in its entirety the accident at Three Mile Island.

Licensee's answers and objections are as follows:

Interrogatory No. 1

With respect to Three Mile Island Alert's (TMIA) First Set of Interrogatories and First Request for Production; TMIA's Second Set of Interrogatories and Second Request for Production; and TMIA's Third Set of Interrogatories and Third Request for Production, supplement any response that is no longer complete, current or accurate.

Response:

Licensee has reviewed its responses to TMIA's First, Second and Third sets of discovery requests to Licensee. Exclusive of any new information which may have been revealed as a result of depositions of Licensee witnesses by TMIA and additional responses to Questionnaires which have been placed in the Discovery Room and which are available to TMIA, Licensee provides the following supplemental responses:

First Set

- No. 12. Licensee has today learned that its supplemental response to Interrogatory No. 12, in Licensee's Third Supplemental Response to Three Mile Island Alert's First Set of Interrogatories (Oct. 9, 1984), contained some inaccuracy. Licensee is preparing a supplemental response and will file it tomorrow.
- No. 14. GPU Interview of C. Faust (March 30, 1979) mentioned the pressure pulse.
- No. 16. Herman Dieckamp was driven from Harrisburg, PA to Mountain Lakes, N.J. in the late afternoon and evening of March 28, 1979. Mr. Dieckamp had dinner at a restaurant in Trexlertown, PA. Mr. Dieckamp was accompanied to New Jersey by Mr. Jim McConnell and Mr. Ken McKee, both GPUSC personnel, who were in Harrisburg, PA on March 28, 1979, to meet with Lt. Governor Scranton on a matter unrelated to the TMI-2 accident. Mr. McKee and Mr. McConnell think that they were present when Mr. Dieckamp ran into Mr. Herbein, Mr. Miller and Mr. Kunder on the Capitol steps, but neither recalls any details of the conversation that ensued.

Third Set

No. 4. Additional addresses:

1. Gary Capadonno - GPUNC, Cherry Hill
Building
2. William Hirst - Pennsylvania Electric
Company, Johnstown, PA
3. Richard K. Lentz - 7826 Richland Road
Pulaski, N.Y. 18142

Interrogatory No. 2

With respect to the time period from at or about 2:00 p.m. to at or about 8:00 p.m. on March 28, 1979, state the following regarding Mr. Dieckamp's actions or activities on that date:

(a) describe all Mr. Dieckamp's actions or activities from the time he met with Mr. Herbein, Mr. Miller and Mr. Kunder on steps of the State Capitol in Harrisburg, Pennsylvania until he returned to his home in New Jersey. With respect to all such actions or activities identify the following:

(i) the precise time he arrived at each location;

(ii) the precise method of transportation he used to move from one location to another, i.e., by company car, airplane, private car, taxi, etc.

(iii) the person(s) who accompanied him for any portion of the trip or time he moved from one location to the next;

(iv) any communications between or among the persons who accompanied Mr. Dieckamp, whether or not Mr. Dieckamp participated in any such communications;

(v) any communications between Mr. Dieckamp and Mr. Arnold during this period of time;

(vi) any communications between Mr. Dieckamp and Mr. Creitz during this period of time;

(vii) the precise method of any communication identified in subparts (v) and (vi) above, that is, whether by telephone, radio, walkie-talkie, wire, or other means of communication;

(viii) any documents which record or otherwise refer to or mention Mr. Dieckamp's activities or travel, including but not limited to airplane logs; telephone or itinerary records; calendars; travel arrangement; chauffeur logs; and telephone records. This interrogatory is to be answered by all individuals within GPU with relevant information about Mr. Dieckamp's actions or activities on March 28, 1979.

Response: Licensee objects to this interrogatory. The interrogatory is irrelevant to the issue in the remanded proceeding on the Dieckamp mailgram in that it does not purport to address the pressure spike, spray actuation, or generation and subsequent combustion of hydrogen, or any other topic of communication reasonably related to the pressure spike or the Dieckamp mailgram.

Licensee has already provided copies of the results of questionnaires of Licensee's employees and ex-employees regarding their knowledge of and communications about the pressure spike, spray actuation, hydrogen, and instructions not to operate electrical equipment on March 28. Licensee has previously provided response to interrogatories on these topics, including identification of specific communications with Mr. Dieckamp.

The interrogatory is also oppressive, unduly burdensome, and unduly expensive. In effect, at the last possible moment TMIA asks Licensee to canvass all its employees to attempt to ascertain the exact movements of and precise substance of any communication with Mr. Dieckamp, however irrelevant. Such an unfocused and farreaching request is beyond the pale. TMIA has already received Mr. Dieckamp's written responses to interrogatories, which provide TMIA information on Mr. Dieckamp's activities and communications. See Licensee's Response to TMIA's First Set of Interrogatories and First Request for Production (Sept. 4, 1984), Interrogatory Nos. 16 and 34; Licensee's Supplemental Response to TMIA's First Set of Interrogatories and First Request for Production (Sept. 11, 1984), Interrogatory No. 16. Additionally, Messrs. Dieckamp, Herbein, Miller, Kunder, and Arnold have been deposed at length by TMIA on these very subjects.^{1/} There is simply no justification for the further, unbridled, and extremely onerous inquiry that this interrogatory now asks Licensee to undertake.

Interrogatory No. 3

Identify all communications between Mr. Arnold and Mr. Dieckamp on March 28, 1979 and between Mr. Creitz and Mr. Dieckamp on March 28, 1979. The basis for this question is that Mr. Herbein testified in his deposition on September 28, 1979, that he believes that both Mr. Arnold and Mr. Creitz communicated with Mr. Dieckamp on March 28, 1979 about the TMI-2 Accident, although he could not

^{1/} TMIA is as well seeking to depose Mr. Creitz.

remember or did not know the specific issues or items discussed during those conversations.

Response: Licensee objects to this interrogatory as irrelevant in that it does not inquire into and is not limited to communications addressing the pressure spike, spray actuation, or generation and subsequent combustion of hydrogen, or any other topic reasonably related to the pressure spike or the Dieckamp mailgram.

This interrogatory is also oppressive, unduly burdensome, and unduly expensive and unnecessary. Mr. Dieckamp has already provided a written response to interrogatories addressing his communications; and TMIA has deposed Mr. Arnold, Mr. Dieckamp, and Mr. Herbein at length in these areas. There is no justification for having Licensee duplicate the responses of these individuals.2/

Interrogatory No. 4

Identify all communications between Mr. Arnold and any of the following individuals on March 28, 1979:

- (a) T. Gary Broughton
- (b) J. P. Moore
- (c) J. Abramovici

2/ Even if it were reasonable to reiterate deposition testimony -- and it is not -- Licensee has not yet received the deposition transcripts that would permit such an exercise. Also, because Licensee does not yet have copies of the deposition transcripts, Licensee is unable to assess the accuracy of TMIA's characterization in the interrogatory of Mr. Herbein's testimony.

(d) G. Lehmann

(e) R. Lentz

Response: Licensee objects to this interrogatory. TMIA has the results of questionnaires from each of these individuals regarding their knowledge and communications on March 28, 1979, about the pressure spike, spray actuation, general and subsequent combustion of hydrogen, and instruction not to use electrical equipment. To the extent this interrogatory now seeks the substance of communications that do not address these topics and that are not limited to any other topic reasonably related to the Dieckamp mailgram, the interrogatory exceeds the scope of this proceeding.

Licensee also objects to this interrogatory as oppressive, unduly burdensome, and unduly expensive. Messrs. Arnold, Broughton, Moore, Abramovici, and Lentz have already been deposed by TMIA in this area; no request has been made to depose Mr. Lehmann. There is no justification for requiring Licensee to reiterate their testimony.

Interrogatory No. 5

Identify all communications on March 28, 1979, between the TMI-1 Control Room, the TMI-2 Control Room, or the Observation Center, on the one hand, and General Public Utilities Service Corporation offices or GPUSC's Mountain Lakes office, on the other hand. Include in your identification communications between or among the following individuals:

(a) R. Arnold;

(b) R. Wilson;

- (c) E. G. Wallace;
- (d) William Hirts;
- (e) Richard Lentz;
- (f) T. Gary Broughton;
- (g) D. Cronenberger;
- (h) Mr. Capodanno;
- (i) J. Moore;
- (j) R. Keaton;
- (k) G. Lehmann;
- (l) J. Abramovici;
- (m) L. Rogers;
- (n) S. Maingi;
- (o) G. Schaedel;
- (p) I. Porter;
- (q) J. Flint;
- (r) U. Putman;
- (s) R. W. Winks;
- (t) J. J. Kelly;
- (u) T. Twilley;
- (v) E. Yuchrein;
- (w) D. Uhl.

Response: Licensee objects to this interrogatory as irrelevant. The interrogatory does not address the pressure spike, spray actuation, or generation and subsequent combustion of hydrogen, or any other topic of communication reasonably related to the pressure spike or the Dieckamp mailgram.

Licensee also objects to this interrogatory as oppressive, unduly burdensome, and unduly expensive. The interrogatory asks Licensee at the last possible moment not only to canvass 23 individuals, a number of whom are former B&W employees not within Licensee's control, in order to identify every communication among these individuals, regardless of relevance, but also to identify every other communication between TMI-1 Control Room, TMI-2 Control Room, and the Observation Center and presumably all GPU Service Corporation offices.

Finally, a number of the 23 individuals identified in the interrogatory have already been deposed by TMIA and questioned with regard to communications. Licensee also objects to this interrogatory as oppressive, unduly burdensome, and unduly expensive to the extent it asks Licensee to reiterate their testimony.

Interrogatory No. 6

Identify all persons who provided Mr. Moore with the information which he wrote in his notes for March 28, 1979, at 5:00 p.m.

Response: Licensee objects to this interrogatory as irrelevant. The interrogatory does not address the pressure spike, spray actuation, or the generation and subsequent combustion of hydrogen, or any other topic reasonably related to the pressure spike or the Dieckamp mailgram.

Licensee also objects to this interrogatory as oppressive, unduly burdensome, and unduly expensive. Mr. Moore has already been fully deposed on this issue by TMIA.

Interrogatory No. 7

Identify all means, methods or lines of communication which existed between TMI-1, TMI-2 or the Observation Center and Mountain Lakes, GPU Service Corporation ("GPUSC"), on March 28, 1979.

Identify the function of all persons who at any time from March 28, 1979 to March 30, 1979 were located at GPUSC, Parsippany, or GPUSC at Mountain Lakes, with regard to the ongoing TMI Accident. Specifically establish the function, duties and responsibilities, and actions and activities of the following persons on March 28, 1979:

- (a) D. Cronenberger;
- (b) R. Keaten;
- (c) N. Trikouros;
- (d) D. Slear;
- (e) T. Dempsey;
- (f) R. Heward;
- (g) B. McCutcheon;
- (h) J. Barton;
- (i) M. Kostrey;
- (j) B. Reinmann;
- (k) L. Rochino;
- (l) T. Lu;
- (m) L. Garibian;
- (n) T. Golian;
- (o) L. Zanis;

(p) J. Langenbach;
(q) L. Lanese;
(r) J. DeVine;
(s) W. Schmauss;
(t) G. Staudt;
(u) R. Chisholm;
(v) S. Levin;
(w) B. Elan;
(x) R. Cutler;
(y) G. Braulke;
(z) F. G. Maus;
(aa) I. Feinberg;
(bb) S. Deshmukh;
(cc) J. Daniel;
(dd) G. Steuerwald;
(ee) J. Thorpe;
(ff) R. Arnold;
(gg) R. Wilson;
(hh) E. G. Wallace;
(ii) W. Lowe;
(jj) T. Fischer;
(kk) M. Morrell;
(ll) D. Reppert;
(mm) R. McGoey.

Response: Lines, means and methods of communication between

TMI-1, TMI-2, or the Observation Center and Mountain Lakes, GPU Service Corporation as they existed on March 28, 1979 included telephonic communications. Licensee is unaware of any direct or open communication line between TMI-1, TMI-2, or the Observation Center and Mountain Lakes, GPU Service Corporation on March 28, 1979, although T.G. Broughton in his June 11, 1979 interview at page 23 suggests there was an open line between the site and GPU Service Corporation in New Jersey in the afternoon of March 28, 1979. Licensee is unable to substantiate that testimony.

With respect to the request to identify the function of all persons who were located at Mountain Lakes or Parsippany on March 28, 29, or 30, 1979, and to establish the "function, duties and responsibilities, actions and activities" of the 39 named individuals, Licensee objects. The information requested is irrelevant and unnecessary to the remanded proceeding. Moreover, this last minute request is extremely oppressive and burdensome. It would require a significant investigative effort to gather and complete this information -- information that is of no worth whatsoever.

Interrogatory No. 8

Identify all communications between Mr. Arnold and B&W on March 28, 1979, concerning the TMI-2 Accident.

Response: Licensee objects to this interrogatory as irrelevant. The interrogatory does not address the pressure spike, spray

actuation, or the generation and subsequent combustion of hydrogen, or any other topic reasonably related to the pressure spike or Dieckamp mailgram.

Licensee also objects to this interrogatory as oppressive, unduly burdensome, and unduly expensive. Mr. Arnold has already been fully deposed by TMIA with respect to his communications, and it is unreasonable to require Licensee to reiterate his responses.

Interrogatory No. 9

Identify all information available to Mr. Arnold at the time he suggested, recommended, urged, ordered and/or directed that site personnel take the following actions during the afternoon of March 28, 1979.

- (a) repressurize the TMI-2 reactor;
- (b) start HPI or increase HPI;
- (c) start a reactor coolant pump.

Identify all persons with whom Mr. Arnold consulted in making these suggestions, recommendations, orders or directions identified above. Specifically state whether he consulted with the following individuals in making such recommendations, order or directions;

- (a) J. Herbein;
- (b) H. Dieckamp;
- (c) W. Creitz;
- (d) any B&W personnel.

With respect to any person identified above with whom Mr. Arnold consulted state the following:

- (a) the information he/she possessed concerning the conditions of the reactor and/or the strategies being used or considered to bring the reactor to a stable condition;

(b) the persons he/she has previously consulted regarding the condition of the reactor;

(c) all data he/she had reviewed or of which he/she had been informed prior to consultation with Mr. Arnold.

Response: Licensee objects to this interrogatory as irrelevant. The interrogatory does not address the pressure spike, spray actuation, or the generation and subsequent combustion of hydrogen, or any other topic reasonably related to the pressure spike or Dieckamp mailgram.

Licensee also objects to this interrogatory as oppressive, unduly burdensome, and unduly expensive. Mr. Arnold has already been fully deposed by TMIA with respect to his communications, and it is unreasonable to require Licensee to reiterate his responses.

Interrogatory No. 10

Mr. Chwastyk testified that awareness of the pressure spike and its implications led Mr. Miller to change to a repressurization strategy shortly after 1:50 p.m. on March 28, 1979.

With regard to the repressurization strategy implemented in the afternoon of March 28, 1979, identify the following:

(a) all actions taken in the course of this repressurization strategy and the reason for taking each such action;

(b) the precise time each such action was taken and the reason for taking each such action at that time;

(c) the person(s) who ordered or directed each such action be taken, and the person(s) who implemented each such action;

(d) the person(s) consulted in the course of determining to implement this strategy and/or the particular actions taken in the course of implementing the strategy.

Response: Licensee objects to this interrogatory as irrelevant. The interrogatory does not address the pressure spike, spray actuation, or the generation or subsequent combustion of hydrogen, or any other topic reasonably related to the pressure spike or Dieckamp mailgram.

Licensee also objects to this interrogatory as oppressive, unduly burdensome, and unduly expensive. TMIA has already deposed Messrs. Chwastyk and Miller (and other individuals) with respect to repressurization despite its irrelevance. It would be unreasonable to require Licensee to reiterate these individuals' responses.^{3/}

Interrogatory No. 11

Several witnesses during depositions taken during the week of September 24, 1984 have testified that operators and other licensee personnel located in the Unit 2 Control Room during the first day of the Accident were debriefed during March 28, 1979 and March 29, 1979.

With respect to such debriefings and/or interviews with operators or other licensee personnel from the TMI-2 Control Room during March 28, 1979, identify the following:

(a) all persons who conducted the interviews or debriefings;

^{3/} In addition, because Licensee has not yet received a transcript of Mr. Chwastyk's deposition, Licensee is unable to assess the accuracy of TMIA's characterization of Mr. Chwastyk's testimony in the interrogatory.

(b) all persons who authorized or directed the interviews or debriefings;

(c) the purpose for the debriefings and/or interviews;

(d) all persons who were debriefed or interviewed on March 28, 1979 or March 29, 1979;

(e) all persons to whom the information obtained during these debriefings and/or interviews was transmitted;

(f) the exact time and date the information obtained during these debriefings and/or interviews were transmitted to the persons identified above and the precise information transferred at these times;

(g) all interviews or debriefings which could have led to the notes taken by J. Moore at or about 5:00 p.m. on March 28, 1979, which had been previously entered into the deposition record as Moore Exhibit 1;

(h) all documents which record, memorialize, mention, or otherwise refer to these debriefings or interviews.

Response: Licensee objects to this interrogatory as irrelevant. The interrogatory does not address the pressure spike, spray actuation, or the generation and subsequent combustion of hydrogen, or any other topic reasonably related to the pressure spike or Dieckamp mailgram.

Licensee also objects to this interrogatory as oppressive, unduly burdensome, and unduly expensive. As it notes, TMIA has already questioned a number of individuals on debriefings during the recent depositions. It would be unreasonable to require Licensee to reiterate their responses, particularly when Licensee has not yet received the transcripts of their

depositions. In addition, Licensee would have to undertake a major investigative effort to attempt to ascertain the information asked in this interrogatory (e.g., to identify every person to whom irrelevant information obtained during interviews or debriefings was transmitted). Such a last minute and considerable effort is certainly not justified by TMIA's request for such useless information.

Interrogatory No. 12

Identify all persons who directed that Mr. Moore be prevented access to Three Mile Island (TMI-1 and TMI-2) on March 28, 1979, when he originally arrived at the TMI site. Identify all persons who directed that any other GPU Service Corporation personnel be denied access to the TMI-2 Control Room on March 28, 1979, including but not limited to any of the group of GPUSC engineers Mr. Herbein has testified Mr. Arnold sent to the TMI site on March 28, 1979.

Response: Licensee objects to this interrogatory as irrelevant. The interrogatory does not address the pressure spike, spray actuation, or the generation and subsequent combustion of hydrogen, or any other topic reasonably related to the pressure spike and Dieckamp mailgram. TMIA had in depositions specifically inquired not only of engineers regarding their access to TMI on March 28, but also of at least Mr. Miller and Mr. Herbein regarding access to the plant on March 28. Licensee therefore also objects to this interrogatory as burdensome and unnecessary.

Interrogatory No. 13

State Licensee's position as to the following:

(a) Should the pressure spike indicating a real increase in pressure to at least 28 psi have been reported to licensee management, GPUSC management, the NRC or the Commonwealth of Pennsylvania on March 28, 1979?

(b) Should the initiation of containment sprays have been reported to licensee management, GPUSC management, the NRC or the Commonwealth of Pennsylvania on March 28, 1979?

(c) Should the fact of in-core thermocouple readings in excess of 2200 degrees have been reported to licensee management, GPUSC management, the NRC or the Commonwealth of Pennsylvania on March 28, 1979?

Answer the above questions considering two alternate theories:

(a) Control room personnel with knowledge of the condition and/or fact believed the reading or indicators to be accurate and reliable;

(b) Control room personnel with knowledge of the condition and/or fact did not believe the reading or indicator to be accurate and reliable;

Response: Licensee objects to this interrogatory as irrelevant.

The issue in this proceeding is the accuracy of the Dieckamp mailgram -- whether there was evidence that anyone had interpreted the pressure spike in terms of core damages on the day of the accident and had withheld such information. Tr. 27,363. Reportability is simply not at issue, but rather simply whether the significance of the pressure spike was appreciated on the 28th. Licensee has already referred TMIA to testimony that two Licensee employees informed the NRC on the 28th of the

occurrence of the pressure spike, and to Licensee's having informed the NRC of the significance of the pressure spike in the late evening of the 29th or early morning of the 30th. See Licensee's Response to TMIA's First Set of Interrogatories (Sept. 4, 1984), Interrogatory No. 40.

Licensee also objects to this interrogatory as calling for a legal conclusion. TMIA is equally capable of analyzing these facts and NRC law and of making such a legal determination.

Interrogatory No. 14

Identify all person(s) who briefed Mr. Herbein and Mr. Dieckamp on TMI-2 conditions on March 28 through March 29, 1979, and on the Accident sequence of events prior to the presentations made by Mr. Herbein and Mr. Dieckamp to the Congressional delegation led by Senator Gary Hart to the TMI site on March 29, 1979.

Identify the information, data or materials prepared and/or provided to Mr. Dieckamp and Mr. Herbein to aid them in their presentations made on March 29, 1979.

State whether Mr. Herbein or Mr. Dieckamp were informed of the following in preparation for their presentations to the Congressional delegation on March 29, 1979:

(a) in-core temperatures in excess of 2200 degrees had been recorded at TMI-2 on March 28, 1979;

(b) a pressure spike had been recorded at approximately 1:50 p.m. on March 28, 1979;

(c) containment sprays had been actuated at approximately 1:50 p.m. on March 28, 1979, indicating a real increase in pressure to at least 28 psi;

(d) an explosion, hydrogen generation, hydrogen burn or hydrogen explosion had occurred or was suspected to have occurred on March 28, 1979.

Response: Licensee objects to this interrogatory as oppressive,

unduly burdensome and expensive. Both Mr. Herbein and Mr. Dieckamp have been deposed by TMIA in this area; and Mr. Dieckamp has answered written interrogatories with respect to his communications on and knowledge of the topics referred to in this interrogatory. It would be unreasonable to require Licensee to reiterate their responses.

Interrogatory No. 15

State all reasons that Mr. Herbein was not directed to station himself at TMI-2 during March 28, 1979, given the fact that he was the highest ranking Met-Ed official at the TMI site on that date.

State all reasons that Mr. Herbein chose not to locate and/or station himself at TMI-2 during March 28, 1979, and instead chose to work from the Observation Center.

Response: Licensee objects to the interrogatory as irrelevant and beyond the scope of the remanded proceeding. The interrogatory does not address the pressure spike, spray actuation, generation and combustion of hydrogen, or any other topic reasonably related to the pressure spike or Dieckamp mailgram.

Licensee also objects to this interrogatory as oppressive, unduly burdensome, and unduly expensive. Mr. Herbein has already been deposed by TMIA. It would be unreasonable to require Licensee to reiterate his testimony.

Interrogatory No. 16

Identify all home and business phone numbers for the following licensee personnel on March 28, 1979:

- (a) Herman Dieckamp;
- (b) Robert Arnold;
- (c) Walter Creitz;
- (d) Richard Wilson;
- (e) E. Wallace;
- (f) Robert Keaton;
- (g) D. Cronenberger.

| <u>Response:</u> | <u>Home</u> | <u>Business</u> |
|---------------------|----------------|-----------------|
| Mr. Herman Dieckamp | (201) 334-4064 | (201) 263-4900 |
| Mr. Robert Arnold | (201) 625-5044 | (201) 263-4900 |
| Mr. Walter Creitz | (215) 372-9519 | (215) 921-6170 |
| Mr. Richard Wilson | (201) 334-6597 | (201) 263-4900 |
| Mr. E. Wallace | (201) 729-2530 | (201) 263-4900 |
| Mr. Robert Keaton | (201) 455-0173 | (201) 263-4900 |
| Mr. D. Cronenberger | (201) 455-1496 | (201) 263-4900 |

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

Ernest L. Blake, Jr.

Ernest L. Blake, Jr., P.C.
David R. Lewis

Counsel for Licensee

Dated: October 15, 1984

October 15, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Response to Three Mile Island Alert's Fifth Set of Interrogatories to General Public Utilities," dated October 15, 1984, were served on those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 15th day of October, 1984.

Ernest L. Blake, Jr.
Ernest L. Blake, Jr., P.C.

Dated: October 15, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter)

METROPOLITAN EDISON COMPANY)

(Three Mile Island Nuclear
Station, Unit No. 1))

Docket No. 50-289 SP

(Restart Remand on Management)

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