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'84 NOV -5 A11:39
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November 1, 1984

Ernest L. Blake, Jr., Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M Street N.W.
Washington, D.C. 20002

DOCKET NUMBER
PROD. NO.

50-289 SP

Dear Ernie:

In accordance with our discussion last Tuesday, October 30, I am writing to inform you of a tentative list of witnesses which TMIA intends to call, largely as adverse witnesses, on the Dieckamp Mailgram issue.

From our discussion last Tuesday, I understand that you will not object to TMIA's filing a final list of witnesses on Monday, November 5, making additions or deletions to the tentative list we are providing you today. You further stated that you desire the list by November 1, 1984, in order to begin preparation for the hearing scheduled to begin on November 14.

We also discussed whether it would be possible to stipulate to the introduction of questionnaires and depositions of certain individuals who originally answered affirmatively to question 3(a) on GPU's questionnaire asking whether on March 28, 1979, the first day of the accident, they had learned or been informed of a hydrogen explosion or combustion. You stated that you would consider such a stipulation when TMIA had identified the persons whose depositions it wished to introduce in lieu of testimony.

I further suggested that we stipulate to the introduction of a number of questionnaires which I regard as GPU responses to TMIA's interrogatories, and answers to which GPU is bound. You stated that you would consider TMIA's request. I have not yet compiled this list of questionnaires but will provide it to you shortly.

Finally, as I believe I mentioned to you on Tuesday, TMIA wishes the testimony of a number of witnesses on a narrow range of questions. These questions were asked of the witnesses during their depositions. If we can reach some agreement on introduction of their depositions in lieu of their testimony on these narrow points, I propose we enter into a stipulation on the introduction of the relevant portions of their depositions. Again, I will inform you shortly of the list of individuals whose testimony TMIA believes may be handled in this manner.

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With this preface, here is TMIA's tentative list of witnesses on the Dieckamp Mailgram issue:

1. Brian Mehler;
2. Joseph Chwastyk;
3. Theodore Illjes;
4. Ivan Porter;
5. George Kunder;
6. Michael Ross;
7. Gary Miller;
8. Richard Bensei;
9. Walter "Bubba" Marshall;
10. John Herbein;
11. Robert Arnold;
12. T. Gary Broughton;
13. James Moore;
14. Richard Lentz;
15. Julien Abramovici;
16. Walter Creitz;
17. Robert Keaten;
18. William Yeager;
19. Thomas Crimmins;
20. Those answering yes to knowledge/awareness of a hydrogen explosion or combustion on March 28, 1979:
 - (a) Thomas Mulleavy;
 - (b) Joseph DeMan;
 - (c) Lorraine Beeman;
 - (d) J. K. Lionarons;

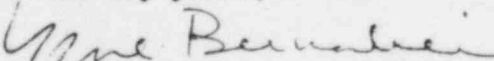
- (e) Donald E. Smith;
- (f) David E. Zeiter;
- (g) A. P. Rochino;
- (h) Richard L. Benner;
- (i) R. E. Boyer;
- (j) G. L. Civijic;
- (k) David Kemble;
- (l) Ron Natale;
- (m) David Reich;
- (n) T. Riggerbach;
- (o) J. Gingrich;
- (p) Matthew Joyce;
- (q) Edward Hahn; and
- (r) Curtis Conrad;

- 21. Ernest L. Blake (for limited purposes covered in deposition);
- 22. Custodian/author of radiation and other logs for March 28, 1979;
- 23. Custodian of two pressure recorder charts;
- 24. Company representatives who conducted analysis regarding electrical malfunctions provided as GPU response to TMIA Interrogatories 14 and 15 in TMIA's Fourth Set of Interrogatories to GPU.

I also would anticipate that TMIA will question Mr. Diekamp and Mr. Lowe to some extent beyond the scope of their direct testimony.

Again, I wish to emphasize that this is a tentative list of witnesses. I sincerely hope that through prudent stipulations we can eliminate the need to present the testimony of a large number of these witnesses.

Sincerely yours,



Lynne Bernabei
Joanne Doroshow

Attorneys for TMIA