

RELATED CORRESPONDENCE

DOCKETED
USNRC

TMIA 10/1/84

'84 OCT -4 A10:40

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Board

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

NOTICE OF DEPOSITION OF RICHARD W. BENSEL

PLEASE TAKE NOTICE THAT intervenor Three Mile Island Alert ("TMIA") will take the deposition of Richard Bensel currently within the employ of General Public Utilities, on Friday, October 5, 1984, at the Friends of Meeting House, 6th and Herr Streets, 1100 6th St., Harrisburg, PA, 17102. Said deposition will begin at 1:30 p.m. and will continue thereafter until completed.

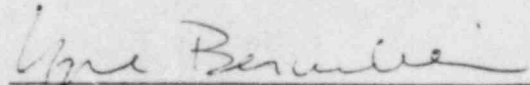
TMIA intends to question Mr. Bensel on matters related to the "Dieckamp mailgram" issue currently pending before this Atomic Safety and Licensing Board.

Respectfully submitted,

Joanne Doroshow/LR

Joanne Doroshow
The Christic Institute
1324 North Capitol
Washington, D.C. 20002
(202) 797-8106

8410050035 841001
PDR ADOCK 05000289
PDR
G



Lynn Bernabei
Government Accountability Project
1555 Connecticut Ave. NW
Suite 202
Washington, D.C. 20002
(202) 232-8550

DATED: October 1, 1984

Attorneys for Three Mile Island
Alert

RELATED CORRESPONDENCE
LOCAL FILED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 OCT -4 A10:40

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

SUBPOENA

THE NUCLEAR REGULATORY COMMISSION AND IVAN W. SMITH, CHAIRMAN,
ATOMIC SAFETY AND LICENSING BOARD, TO: Richard Lentz, Crescent
Drive, R.D. 1, Lake Hopatcong, New Jersey 07849.

YOU ARE HEREBY COMMANDED to appear at a deposition to begin
on Wednesday, October 10, 1984 at the Friends Meeting House, 6th
and Herr Streets, 1100 6th St., Harrisburg, PA 17102, to testify
in the above-captioned matter by Intervenor Three Mile Island
Alert, at 9:30 a.m., and to continue thereafter until completed.
The subject matter of the deposition relates to matters pertain-
ing to the Dieckamp mailgram issue.

YOU ARE FURTHER COMMANDED to produce the following documents
at your deposition on October 10, 1984 at 9:30 a.m. at the
Friends Meeting House, 6th and Herr Streets, 1100 6th St.,
Harrisburg, Pennsylvania 19102:

1. All personal notes, logs, diaries, and any other
documents contained in your personal files, concerning the
events of March 28, March 29, and March 30, 1979 at TMI-2.

2. All interviews in your possession which were taken concerning the TMI-2 accident.

3. All correspondence and other written communications between you and General Public Utilities, Metropolitan Edison Company, GPU Service Corporation, GPU Nuclear Corporation or Group, Pennsylvania Electric Company, or Jersey Central Power and Light Corp., or employees thereof concerning the events occurring on March 28, March 29 or March 30, 1979 at TMI-2.

4. All correspondence and other written communications between you and General Public Utilities, Metropolitan Edison Company, GPU Service Corporation, GPU Nuclear Corporation or Group, Pennsylvania Electric Company, or Jersey Central Power and Light Corp., or employees thereof regarding reporting of information during the TMI-2 accident to the NRC or the Commonwealth of Pennsylvania.

You have been subpoenaed by Intervenor Three Mile Island Alert, Inc.

Pursuant to the Commission's regulations at 10 CFR 2.720(f), on motion made by you promptly, and in any event before 9:30 a.m., on October 10, 1984, and on notice to attorney for Intervenor, the Chairman of the Atomic Safety and Licensing Board, or, if he is unavailable, any alternative Chairman may (1) quash or modify the Subpoena if it is unreasonable or requires evidence not relevant to any matter in issue, or (2) condition denial of the motion on just and reasonable grounds.

YOU ARE HEREBY NOTIFIED THAT ANY FAILURE TO OBEY THIS
SUBPOENA MAY BE DEEMED A CONTEMPT AND APPROPRIATE SANCTIONS
MAY BE ORDERED.

DATED THIS _____ day of _____, 1984.

ATOMIC SAFETY AND LICENSING BOARD

By: _____

Ivan W. Smith, Chairman

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

'84 OCT -4 A10:41

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)

METROPOLITAN EDISON COMPANY)

(Three Mile Island Nuclear
Station, Unit 1))

Docket No. 50-289 SP
(Restart-Management Phase)

SUBPOENA

THE NUCLEAR REGULATORY COMMISSION AND IVAN W. SMITH, CHAIRMAN,
ATOMIC SAFETY AND LICENSING BOARD, TO: Walter Creitz, 830
Berkshire Drive, Redding, Pennsylvania, 19601.

YOU ARE HEREBY COMMANDED to appear at a deposition to begin
on Wednesday, October 10, 1984, at the Friends Meeting House,
6th and Herr Streets, 1100 6th Street, Harrisburg, Pennsylvania,
17102, to testify in the abovecaptioned matter by Intervenor
Three Mile Island Alert, at 1:30 p.m. and to continue thereafter
until completed. The subject matter of the deposition relates
to matters pertaining to the Dieckamp mailgram issue.

YOU ARE FURTHER COMMANDED to produce the following documents
at your deposition on October 10, 1984, at 1:30 p.m., at the
Friends Meeting House, 6th and Herr Streets, 1100 6th Street,
Harrisburg, Pennsylvania, 17102.

1. All personal notes, logs, diaries, and any other
documents contained in your personal files, concerning the
events occurring at Three Mile Island, Unit 2, on March 28,
March 29, or March 30, 1979.

2. All interviews or statements in your possession which were taken concerning the TMI-2 Accident.

3. All correspondence and other written communications between you and General Public Utilities, Metropolitan Edison Company, GPU Service Corporation, GPU Nuclear Corporation or Group, Pennsylvania Electric Company, or Jersey Central Power and Light Corporation, or employees or management thereof concerning the events occurring during the TMI-2 Accident from March 28, 1979 through March 30, 1979.

4. All correspondence and other written communications between you and General Public Utilities, Metropolitan Edison Company, GPU Service Corporation, GPU Nuclear Corporation or Group, Pennsylvania Electric Company, or Jersey Central Power and Light Corporation, or management or employees thereof, regarding reporting of information during the TMI-2 Accident to the NRC or to the Commonwealth of Pennsylvania.

You have been subpoenaed by Intervenor Three Mile Island, Inc.

Pursuant to the Commission's regulations at 10 CFR 2.720(f), on motion made by you promptly, and in any event before 1:30 p.m. on October 10, 1984, and on notice to attorney for Intervenor, the Chairman of the Atomic Safety and Licensing Board, or, if he is unavailable, any alternative Chairman, may (1) quash or modify the subpoena if it is unreasonable or requires evidence not relevant to any matter in issue, or (2) condition denial of the motion on just and reasonable grounds.

YOU ARE HEREBY NOTIFIED THAT ANY FAILURE TO OBEY THIS
SUBPOENA MAY BE DEEMED A CONTEMPT AND APPROPRIATE SANCTIONS MAY
BE ORDERED.

DATED THIS _____ day of _____, 1984.

ATOMIC SAFETY AND LICENSING BOARD

BY

Ivan W. Smith, Chairman

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

DOCKETED
USNRC

'84 OCT -4 A10:41

In the Matter of)
)
METROPOLITAN EDISON COMPANY)
)
(Three Mile Island Nuclear)
Station, Unit No. 1)

Docket No. 50-289 SP

(Restart - Management Phase)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

I hereby certify that a copy of the foregoing TMIA's Second Supplemental Response to Licensee's First Set of Interrogatories and First Request for Production (Training); TMIA's Response to Licensee's Third Set of Interrogatories and Third Request for Production (Dieckamp Mailgram); Intervenor TMIA's Fifth Set of Interrogatories to GPU; Notices of Deposition of T. Gary Broughton, Nelson Bennett, and Richard W. Bensel; and Applications for Issuance of Subpoena Duces Tecum to Richard Lentz and Walter Creitz have been served this 1st day of October, 1984, by mailing a copy first-class postage prepaid to the following:

Administrative Judge
Ivan W. Smith, Chairman
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Sheldon J. Wolfe
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Gustave A. Linenberger, Jr.
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Jack R. Goldberg, Esq.
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Thomas Au, Esq.
Office of Chief Counsel
Department of Environmental
Resources
505 Executive House
P.O. Box 2357
Harrisburg, PA 17120

John A. Levin, Esq.
Assistant Counsel
Pennsylvania Public Utility
Commission
P.O. Box 3265
Harrisburg, PA 17120

*Ernest L. Blake, Jr.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036

Mr. Henry D. Hukill
Vice President
GPU Nuclear Corporation
P.O. Box 480
Middletown, PA 17057

Mr. and Mrs. Norman Aamodt
R.D. 5
Coatesville, PA 19320

Ms. Louise Bradford
TMI ALERT
1011 Green Street
Harrisburg, PA 17102

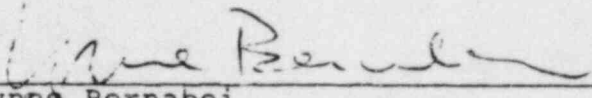
Joanne Doroshow, Esq.
The Christic Institute
1324 North Capitol Street
Washington, D.C. 20002

Michael F. McBride, Esq.
LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Suite 1100
Washington, D.C. 20036

Michael W. Maupin, Esq.
Hunton & Williams
707 East Main Street
Post Office Box 1535
Richmond, VA 23212

Ellyn R. Weiss, Esq.
William S. Jordan, III, Esq.
Harmon, Weiss & Jordan
2001 S Street, Northwest
Suite 430
Washington, D.C. 20009

TMI-PIRC Legal Fund
1037 Macclay
Harrisburg, Penn. 17103



Lynne Bernabei

* Served by hand.