

87  
SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

1800 M STREET, N. W.

WASHINGTON, D. C. 20036

TELEX  
89-2693 (SHAWLAW WSH)  
CABLE "SHAWLAW"

TELEPHONE  
(202) 822-1000  
WRITER'S DIRECT DIAL NUMBER

December 26, 1984

RELATED CORRESPONDENCE  
DOCKETED  
USNRC

TELECOPIER  
(202) 822-1099 & 822-1199

RAPIFAX 100  
(202) 822-1072  
OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

(202)822-1084

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

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

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

In the Matter of  
Metropolitan Edison Company  
(Three Mile Island Nuclear Station, Unit No. 1)  
Docket No. 50-289 SP

Dear Sirs:

On the last day of the Mailgram hearing, Licensee offered as Licensee Mailgram Exhibit 4 a portion of TMIA's deposition of Richard Lentz addressing whether he had obtained a copy of the containment pressure strip chart on the evening of March 28, 1979. TMIA opposed Licensee's offer and the Board rejected it. The Board, however, afforded Licensee the opportunity to present Mr. Lentz on this point during the week of January 2, 1985.

Licensee has attempted to obviate the need for Mr. Lentz to travel from New York in order to support this very limited additional testimony. In this regard, Licensee has reviewed Mr. Lentz's June 1, 1979 I&E interview, which is item 47 in Part C of Joint Mailgram Exhibit 1. In that interview, Mr. Lentz was asked whether he xeroxed any analog output on the evening of the 28th. He answered no. He was also asked whether any analog data was taken off the charts at that time, and he replied he was fairly sure this data was taken off on the 29th. NRC Interview of R. Lentz (June 1, 1979) at 9.

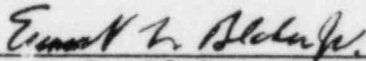
SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

Licensee has asked TMIA to stipulate that "analog output" includes the containment pressure strip chart and that Mr. Lentz's prior interview indicates he did not collect a copy of this chart on the evening of the 28th. TMIA, however, has refused to enter into such a stipulation.

Accordingly, Licensee finds it necessary to have Mr. Lentz testify. Mr. Lentz is available and has made arrangements to be in Harrisburg on January 3, 1985. Licensee suggests that he appear that day right after the noon recess; it is expected that his appearance will be brief. Mr. Lentz simply will sponsor that portion of his deposition that was offered as Licensee Mailgram Exhibit 4.

Sincerely,



Ernest L. Blake, Jr.  
Counsel for Licensee

CC: Service List

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

SERVICE LIST

Nunzio J. Palladino, Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Thomas M. Roberts, Commissioner  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

James K. Asselstine, Commissioner  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Frederick Bernthal, Commissioner  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Lando W. Zeck, Jr., Commissioner  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge  
Gary J. Edles, Chairman  
Atomic Safety & Licensing Appeal  
Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge  
John H. Buck  
Atomic Safety & Licensing Appeal  
Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge  
Christine N. Kohl  
Atomic Safety & Licensing Appeal  
Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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. (4)  
Office of the Executive Legal  
Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

William T. Russell  
Deputy Director, Division  
of Human Factors Safety  
Office Of NRR  
Mail Stop AR5200  
U.S. NRC  
Washington, D.C. 20555

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, Esquire  
The Christic Institute  
1324 North Capitol Street  
Washington, D.C. 20002

Lynne Bernabei, Esq.  
Government Accountability  
Project  
1555 Connecticut Avenue  
Washington, D.C. 20009

Ellyn R. Weiss, Esq.  
Harmon, Weiss & Jordan  
2001 S Street, N.W., Suite 430  
Washington, D.C. 20009

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  
P.O. Box 1535  
Richmond, VA 23212