

LIC 10/2/81

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



LICENSEE'S SECOND SET OF
DISCOVERY REQUESTS ADDRESSED
TO THE AAMODTS

1. With respect to the Aamodts' review and analysis of tests and examinations administered by Licensee or its consultants to TMI-1 operators and candidates for operating licenses, identify each answer or set of answers which the Aamodts claim, individually or collectively, constitute evidence of cheating or possible cheating. With respect to each such answer or set of answers:

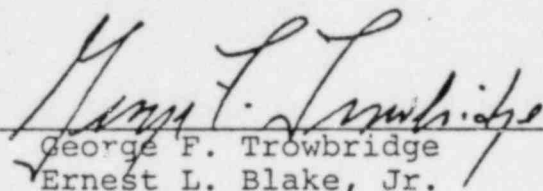
- (a) Give the designation and date of the test or examination involved;
- (b) Using letter designations supplied by Licensee, identify the operators and candidates claimed to be involved in cheating or possible cheating; and
- (c) Explain fully the basis on which the Aamodts claim that there is evidence of cheating or possible cheating.

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2. Provide the name, address, occupation and qualifications of each person who assisted the Aamodts in reviewing the tests and examinations identified in item 1 above.

DATED: October 2, 1981.

SHAW, PITTMAN, POTTS & TROWBRIDGE
1800 M Street, N.W.
Washington, D.C. 20036
(202) 822-1000

BY: 
George F. Trowbridge
Ernest L. Blake, Jr.

Counsel for Licensee

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
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METROPOLITAN EDISON COMPANY)
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Docket No. 50-289
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CERTIFICATE OF SERVICE

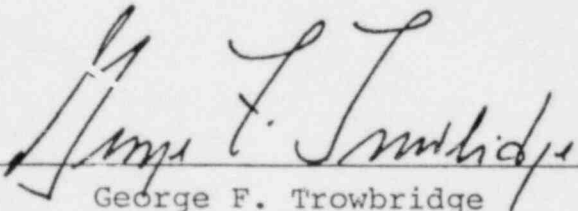
I hereby certify that copies of "Licensee's First Set of Discovery Requests Addressed to the Aamodts in Reopened Hearing" and "Licensee's Second Set of Discovery Requests Addressed to the Aamodts," both dated October 2, 1981, were hand delivered on October 2, 1981 to the Aamodts, TMIA and the NRC Staff; and have been served on the following persons by deposit in the United States mail, postage prepaid, this 5th day of October, 1981:

Administrative Judge Ivan W. Smith (2)
Chairman, Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Robert Adler, Esquire
Karin W. Carter, Esquire
Assistant Attorney General
505 Executive House
Post Office Box 2357
Harrisburg, Pennsylvania 17120

Administrative Judge Gary L. Milhollin
Atomic Safety and Licensing Board
1815 Jefferson Street
Madison, Wisconsin 53711

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


George F. Trowbridge

Dated: October 5, 1981