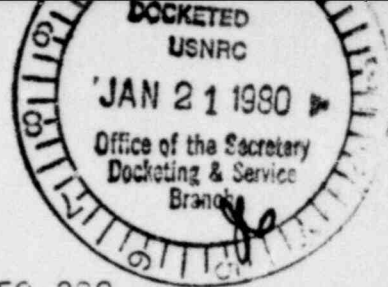


RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
METROPOLITAN EDISON COMPANY, et. al.
(Three Mile Island, Unit 1)

Docket, 50-289

AAMODT RESPONSE TO FIRST SET OF NRC STAFF INTERROGATORIES TO INTERVENORS

The following information is provided for each admitted Aamodt contention: individuals that we intend to present as witnesses, a description of the substance of testimony of these witnesses, and identification of documents to be relied upon in testimony. This information is as complete as we can make prior to discovery. We reserve the right, if possible, to add or delete as new information becomes available or is discovered by us through interrogatories. We understand that this information should not be supplied for deferred contentions at this time.

Contention 2 relates to performance of technicians and management of TMI-1. Witnesses expected to be called are personnel of NRC, Metropolitan Edison and Babcock and Wilcox who are involved in the training or have been involved in the training of operating personnel and management of the nuclear generating plants at Three Mile Island. NRC personnel involved in the licensing of nuclear generating plant personnel. TMI operators, technicians and managers. Penn State employees proposed to oversee man-machine interface. Expert witnesses in the fields of human engineering and nuclear engineering, possibly, in addition to Penn State personnel. NRC and Babcock and Wilcox engineers in area of system reliability and safety.

Specific identity of all individuals is not possible before completion of discovery, however they would include Bruce A. Boger, Walter Haas, B. L. Grenier, R. M. Satterfield, Darrell Eisenhut, Harold Denton, Röger Mattson of NRC; Leland Rogers, Ron Finnin, L. L. Voyner, Gary Bennett of Babcock and Wilcox; James Seelinger, Joseph Logan, Michael Ross, Geroge Kunder, Gary Miller, Fred Scheimann, William Zewe, Edward Frederich, Craig Faust and John Herbein of Met Ed; Robert D. Pollard of Union of Concerned Scientists, Russell W. Peterson.

Testimony would be relative to 1) proposed redesign to minimize operator error, 2) types of accidents and probabilities of occurrence, 3) past and proposed training, testing and licensing of operators and

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managers, 4) types of operator errors, 5) stress situations, 6) theory and documentation of proposed training and testing in context of established concepts of learning principles, 7) credentials and experience of trainers prior and proposed, 8) hiring interview, examination of operators and managers and 9) practices past and proposed for promotion.

Documents to be relied upon include those implied above as well as Reg. Guide 1.47, Kemeny Report including Staff Reports II, III, IV, NUREG 0578, 0600, 0616, NUREG/CP 0009, SECY 79-330 A thru F; Summary of Meeting Held on October 23, 1979 with Representatives of Babcock and Wilcox Owners' Group, B&W and Oak Ridge National Laboratory to Discuss the "Integrated Control System Reliability Analysis" BAW1564, Minutes of meeting August 23, 1979; October 25, 1979 letter of Harold Denton to H. G. Parris including enclosure; December 17, 1979 letter of Darrell Eisenhut to licensees and enclosures; draft report "Preliminary Human Factors Analysis of Zion Nuclear Power Plant October, 1975.

Contention 3 relates to assessment of risk. Witnesses expected to be called are Dr. Roger E. Linneman, Radiation Management Corp., University City Science Center, 3508 Market St., Suite 400, Philadelphia, Pa. 19104 and Dr. Mancuso, University of Pittsburgh on assessment of low-level radiation effects; also Russell W. Peterson, Audubon Society.

Documents to be relied upon will include NUREG 0396, 0578, 0585 and 0616, licensee's emergency proposal, TDR -TMI -116 (Rev. 0 7/31/79), Heidelberg Report, Kemeny Report

Contention 4 relates to information. Witnesses expected to be called are Robert Arnold of Met Ed regarding time lag in dissemination of data and Roger Mattson and Dr. Joseph Hendrie of NRC regarding the impact of institutional considerations on timing of release of information; also Governor Richard Thornburgh and Oran Henderson, Director of Pennsylvania Emergency Management Agency to define timeliness for various localities as a function of distance and population density and to describe conditions that would prevent them from informing the public, i. e., restraints on disclosure relative to institutional judgements; also Penrose Hallowell, Secretary of Agriculture of Pennsylvania regarding what is timely to protect health and safety of animals and keepers; also Edward G. Biester, Attorney General of Pennsylvania regarding what effect the absence of punitive enforcement has on the flow of information: This is relative to August 9 notice of hearing "to provide reasonable assurance..."; also

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Gary Snyder, NRC Region 1 office relative to telephone conversations March 30, 1979 and prior; Public Affairs office Philadelphia Electric Company regarding news releases January 1980 regarding shutdown of Peach Bottom reactor.

Contention 5 relates to evacuation of livestock. Witnesses expected to be called include Penrose Hallowell relative to movement of cattle; also dairy farmers.

Documents to be relied upon include NUREG C585, C396, licensee's emergency plan, TDR-TMI 116(Rev O 7/31/79), Kemeny Report Staff Report IV, Heidelberg Report.

Contention 6 relates to radwaste. Witnesses expected to be called include NRC staff, and Walter Creitz and Robert Arnold of Met Ed to explain the lack of reliability of earlier projections relative to radwaste quantities and the lack of reliability in assessing future radwaste management capabilities. Also Russell W. Peterson, President of Audubon Society and member of Kemeny Commission and individual from Union of Concerned Scientists, yet to be identified, to explore reliability of onsite storage and projected transportation.

Documents to be relied upon include NUREG C552, C575 Vol.1, Executive Summary, Kemeny Report

Contentions 6 and 11, part A have been deferred.

Respectfully submitted, —

Marjorie M. Aamodt
Marjorie M. Aamodt

Dated, January 15, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

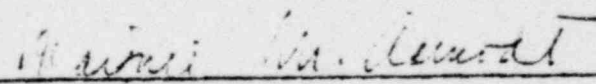
In the Matter of)
METROPOLITAN EDISON COMPANY)
(Three Mile Island Nuclear)
Station, Unit No. 1))

Docket No. 50-289

AFFIDAVIT OF MARJORIE M. AAMODT

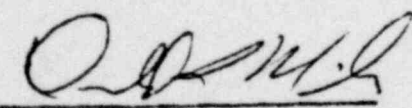
Commonwealth Pennsylvania
County of Chester

MARJORIE M. AAMODT, being duly sworn according to law, deposes and says that she is a resident of Chester County, wife of Norman O. Aamodt and mother of Norman O. Aamodt, jr., Susan E. Aamodt and Jason B. Aamodt, formerly employed by Bell Telephone Laboratories, Murray Hill, New Jersey and the school district of Coatesville, Pennsylvania, graduate of Rutgers University and Brown University with B. S. and M. S. degrees in Experimental Psychology; that the information contained in her Response to Interrogatory of NRC is true and correct to the best of her knowledge and belief.



Marjorie M. Aamodt, Intervenor

Sworn and subscribed
before me this 15 day
of January, 1979



Notary Public

Donald L. Miller, Notary Public
East Fallowfield Township, Chester County
My Commission Expires Mar. 1, 1982
Member, Pennsylvania Association of Notaries

My Commission expires 3-1-82

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