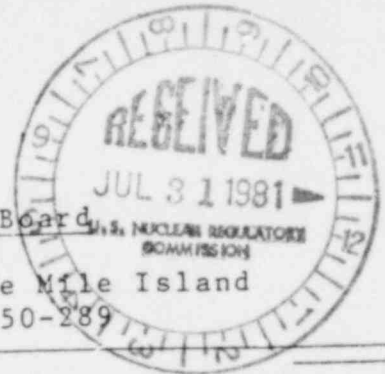


United States of America
Nuclear Regulatory Commission
Before the Atomic Safety and Licensing Board



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

To Administrative Judges Ivan W. Smith, Linda W. Little, Walter H. Jordan

Motion to the Board to Take Official Notice of NRC Letter, June 1, 1981,
to all B&W Licensees and NRC Letter, July 1, 1981, to all Licensees
Regarding Deficiencies in the Training Programs of Licensed Operators

Dear Chairman Smith, and Drs. Little and Jordan:

This is motion to the Board to take official notice of two recent documents of the NRC regarding deficiencies in the training programs of licensed operators.

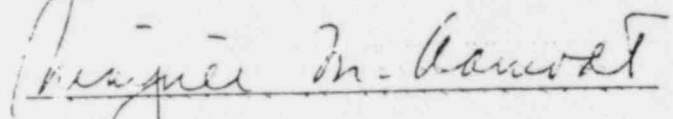
The first document to be noticed is a letter of the NRC, dated June 1, 1981, to all B&W Licensees, in which 8 deficiencies in the design of the ATOG program and its procedures are listed. Since the ATOG program was to have been ready for use with the training department at TMI this month, and since commitments of the Licensee in Exhibit 56 were made specifically on the time for completion of the ATOG training, this motion is timely and appropriate.

The second document to be noticed is a letter of the NRC, dated July 1, 1982, to all Licensees. The deficiencies in overall training per the March 28, 1980 letter of H. Denton have been detected by the Licensing Branch in administering NRC examinations. Since the TMI operators were administered licensing examinations in April, these observations may very well apply to the operators at TMI.

The Board is also requested to consider the testimony of Mr. Kelly which was stated with certainty and not challenged in the hearing. Mr. Kelly was asked, "Do we know all the things that we need to know to operate a nuclear power plant?"

Mr. Kelly, Licensee's expert witness, president of PQS auditors of nuclear training programs, answered, "No is the answer I really want to give." Tr. 12624 - 5.

Respectfully submitted,


Marjorie M. Aamodt

July 20, 1981



DS03
5114



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

June 1, 1981



TO ALL B&W LICENSEES (Except Arkansas Nuclear One, Unit One)

Gentlemen:

SUBJECT: NUREG-0737, ITEM I.C.1, ABNORMAL TRANSIENT OPERATOR GUIDELINES
(ATOG) (Generic Letter No. 81-16)

The staff has completed a preliminary review of the ATOG prepared for Arkansas Nuclear One Unit One and submitted as generic guidelines in response to NUREG-0737, Clarification of TMI Action Plan Requirements, Item I.C.1. We have identified the following deficiencies in areas that were identified in NUREG-0737, but are not addressed by the ATOG submittal:

1. The bases for the consideration of multiple and consequential failures is not provided. The sequence-of-event diagrams are not complete (i.e., ATWS following an initiating event).
2. Supporting analyses for multiple failures are not presented for all cases. The description of the computer programs used to analyze the events is not provided.
3. Operator errors of omission or commission are not addressed.
4. The following multiple failure events are not addressed:
 - (a) SG tube rupture in more than one steam generator;
 - (b) Failure of the high-pressure reactor coolant makeup system;
 - (c) ATWS following an initiating event (with or without a turbine trip); and
 - (d) Failure of main and auxiliary feedwater with partial or complete loss of HPI.
5. The transition from emergency procedures into an adequate core cooling (ICC) procedure is not developed or included. (We understand that B&W is incorporating ICC into the ATOG program for some future submittal.)

Since you have referenced this report as applicable to your facility, please advise us within 30 days of your receipt of this letter of your schedule for response to these items and the impact this will have on your schedule for implementing a program of emergency operating procedures that comply with the requirements of NUREG-0737, Item I.C.1.

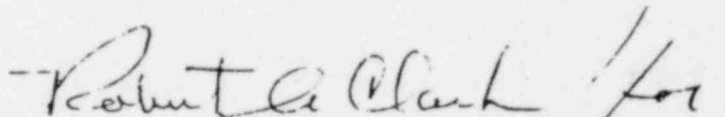
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Underlining Added

All B&W Licensees Except
ANO-1

-2-

Since the responses required by this letter affect fewer than 10 licensees and are required to obtain a benefit, they are not subject to Office of Management and Budget clearance as required by P.L. 96-511.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert A. Novak" followed by a stylized flourish.

Thomas M. Novak, Assistant Director
for Operating Reactors
Division of Licensing

cc:
Service List