

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

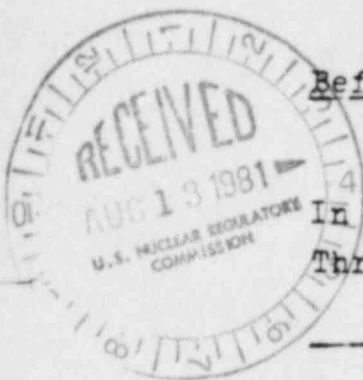
Unit 1, Docket 50-289

Motion for NRC Oral Licensing Examination of TMI-1
Operators to be Given at the B&W Simulator as Required
October, 1981 Forward

The Aamodts motion that the Board require that the oral NRC licensing examinations of TMI-1 operators and senior operators be administered at a simulator, as required by NRC regulations after October, 1981. A letter from NRC to the Board, dated July 28, 1981, indicates that the oral examinations for TMI-1 operators have been scheduled on September 28, 1981, which would exempt these operators from simulator examination.

The requirement of simulator examination evolved from the Lessons Learned from the TMI-2 accident. The NRC studies and others following the accident discovered short-comings in the NRC oral examination and in oral examinations in general. Testimony in the hearing supported the need for simulator examinations.

Although the B&W simulator is not an exact replica of the TMI-1 control room, Metropolitan Edison personnel have testified that it simulates the principles of the control room. The simulator could, therefore, test basic understanding of the way the TMI-1 plant operates, a knowledge found lacking in TMI-2 personnel. There is very strong evidence that TMI-1



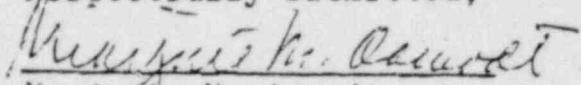
operators lack this kind of understanding of the plant.

The NRC scheduling of the oral examinations in September also appears premature. NRC requires that these examinations should not precede startup of the plant by more than thirty days. Since the Board has not made a decision to restart, and cannot until after the findings and reply findings on emergency planning have been filed in late August, NRC cannot know whether the Board will require further actions by Metropolitan Edison which could require an indeterminate length of time.

NRC appears to be favoring Metropolitan Edison by scheduling the oral licensing examinations immediately prior to the enactment of their requirement of simulator examinations.

In view of the marginal performance of the operators on a number of audits throughout the two years since the accident, the irregularities found on the examinations of some senior operator candidates, and the particularly high failure rate on a test of understanding of the TMI-2 accident following accelerated training, the Board should require, at least, the limited but increased measure of assurance that the simulator examination affords over the oral examination. Although the Commission directed the Board to treat TMI-1 as all other operating reactors except where they found otherwise, the training of the operators and demonstration of increased understanding of the plant through simulator testing is also directed by the Commission in their August 9, 1979 order, specifically Order Item II 1 (e).

Respectfully submitted,


Marjorie N. Aamodt

August 4, 1981