

LICFNSEE'S TESTIMONY
OF
GARY P. MILLER

My name is Gary P. Miller. I am the Director of Startup and Test in GPU Nuclear's Technical Functions Division and formerly was Station Manager of Three Mile Island. Further details on my professional and educational background are provided in Attachment A to this testimony.

As Station Manager of TMI in July, 1979, it came to my attention that questions were being raised concerning operator VV's training examination performance. My first notice of the problem came from James Seelinger, at that time Superintendent of TMI-1. Mr. Seelinger alerted me by phone on July 2nd that operator VV that same day had submitted to the training department written answers to four make-up examinations, which the training department had determined in two of the four areas were unsatisfactory and in two of the four areas (one overlapping) were in another's handwriting. (My initial impression was that one exam section involved a handwriting question but within a day or so I understood two sections were involved.) This resulted in a number of actions.

On July 5th, I met with Mr. Richard Zechman, who at that time was the head of training at TMI. We reviewed operator VV's status in light of his failures on the two sections of the exam and discussed the handwriting question. It was determined that under the training department's procedures, Mr. VV must be relieved of his duties, assigned full-time to an accelerated

training program and be reexamined in the deficient areas. This was because the exams which Mr. VV had taken and failed were make-up exams occasioned by a failure to obtain greater than 80% in these subject areas on prior qualifying examinations. It was also determined that I would take further steps to investigate and resolve the handwriting question.

The next day, Mr. Zechman drafted a memorandum for VV informing him that in accordance with Licensee's procedures, he was being relieved of his other responsibilities to enter a full-time accelerated training program. The memorandum detailed his training assignments, including completion of identified study questions, meetings with training instructors to discuss apparent weak areas of knowledge, and completion of a written examination on the two sections he had failed. The memorandum also informed VV that his return to duty would require, per procedure, sending the NRC certification of his satisfactory rating. A subsequent memorandum by Mr. Zechman prepared on July 11th, at my direction, told VV that he would also have to be reexamined on the section which he had passed but was in another's handwriting.

On the handwriting question, my first step was to identify the other individual involved. Comparisons of handwriting in training's records revealed that the two sections turned in by operator VV which were not in VV's handwriting were the handwriting of another operator, O. On July 7th, I met personally with operator O, together with Mr. Michael Ross,

supervisor of operations at TMI-1. Mr. O confirmed that the handwriting was his. He remembered answering the questions, but stated that he was not aware that he was providing answers for VV's exam. He further stated he did not recognize the questions as Fundamentals and System Review Program (FSR) exam questions, that he had not been dishonest on any examinations, and that he had never been nor would he consider being less than honest.

Two days later, following Mr. VV's return from vacation, I met personally with Mr. VV, along with Mr. Zechman of Training and a personnel department representative at TMI. I reviewed with Mr. VV my earlier discussions with Mr. Seelinger, Mr. Zechman and operator O. Mr. VV confirmed that the four sections of make-up exams were handed in by him and that Mr. O had completed the answers to two of the sections. Mr. Zechman's memorandum was given to VV and he agreed to complete the accelerated program. His explanation for having handed in the work of another was provided without hesitancy. Basically, he stated that he was pressed for time (as we all were during that period) and was trying to complete his work in order to take some time off; that he told O he needed to complete a number of questions and asked O to provide some information to him; that he made no attempt to disguise O's work and felt by completing the responses to the questions and studying them he had completed the training requirements.

My evaluation of this situation and my recommendations were reported in a memorandum to Mr. John Herbein, who was my

boss in Met Ed. I felt, based on this experience, that we should review the requalification program for upgrading, that our procedures should spell out examination requirements, and that we should put in place administrative controls to assure site management was alerted to and took prompt action in situations of this type. My judgment of O's involvement was that his actions were unacceptable, since make-up examinations of this type must be completed by the individual examinee without outside assistance. I was convinced, however, that Mr. O did not recognize that he was completing Mr. VV's training make-up exam. Several factors were important to me. First, it was not as though this was my first exposure to Mr. O. I had known him for years and shared the view of everyone else that I was aware of who knew him, that he was an upstanding individual of unquestioned integrity. His record with the Company was exemplary. Second, there was on the face of the document containing the questions that he answered nothing designating that it constituted a make-up written exam for Mr. VV. A cover sheet from the training department to VV which enclosed all four exams clearly indicated this, but the cover sheet was not seen by Mr. O. Finally, Mr. VV was at that time operator O's boss. It was not to me unreasonable to accept Mr. O's and Mr. VV's independent but confirmatory statements that VV (the boss) asked O (an operator who worked for him) to provide answers to some questions. I recommended that no action be taken with respect to O, since in my view the

investigation itself and my statements to O that his involvement was unacceptable were sufficient to sensitize him to avoid even the potential for similar actions again.

My views on VV's actions and hence my recommendations concerning him were quite different. The training department's written instructions to VV in the cover sheet explaining the four enclosed make-up exams did not explicitly dictate that he himself perform the work and provide the answers. Nevertheless, the training department's policy was clearly that these exams were to be done individually and VV's decision to perform otherwise was very poor judgment. Accepting as I did that he was not attempting to deceive the training department, his involvement of O represented to me an unacceptable lack of regard for the importance that he should have attached to his completion of the test. This lack of regard in my view was further demonstrated by his past poor record of attendance at training sessions and in tardiness of completing make-up assignments. My initial recommendation was that Mr. VV, in addition to his being relieved of responsibilities in order to complete a full-time accelerated review program in accordance with our requalification procedures, be given one week off without pay and that a letter describing this situation be placed in his personnel file. Subsequent to this and after discussions with Mr. J. G. Herbein, this recommendation was modified to include a two-week suspension.

My recommendations regarding Mr. O were accepted. As to Mr. VV, he completed the accelerated program successfully and

expeditiously. He was tested by written exam on the two sections which he had failed. The written exam for these sections included questions on the subject matter covered by the section which O had answered, and VV was also tested orally on this subject to ensure his comprehension of the material. Following successful completion of this testing, NRC was notified of his failures in the make-up exams, his relief from responsibilities and participation in an accelerated program of instruction, and his successful completion of the program.

However, the disciplinary action imposed was a more severe action of relieving Mr. VV of his assignment as Supervisor of Operations, Unit 2, instead of the two weeks suspension without pay. The loss of his licensed line function position demonstrates clearly management's intolerance of Mr. VV's performance.

This experience with a licensed operator during my time as station manager at TMI-1 when I was involved with operations was unique. I did not regard this instance as representative of operator performance on examinations. Nevertheless, my recommendations included taking steps to review and upgrade the requalification program and procedures and to put in place the necessary administrative machinery to promptly alert site management of the possibility of any similar practices. With the advent of the OARP which began at about this time and the increased emphasis on training which that program represented, I was confident that my recommendations would be carried out.

It is my understanding that the OARP has been described in other testimony and that the training department's policies, procedures and guidance to examinees concerning the taking of examinations is addressed in the testimony of others, and I have no first-hand knowledge of training's practices from the fall of 1979 forward, as my functional responsibilities shifted from those as Station Manager to those associated with startup activities.

RESUME

GARY P. MILLER

Education:

- Altoona High School - Graduated 1959
- U. S. Merchant Marine Academy - 1959 thru 1963 - Graduated with BS in Marine Engineering with Honors - Awarded U.S. Coast Guard License - Third Assistant Engineer - Steam or diesel of unlimited horsepower. License is currently maintained.

Work Experience:

1973 to Present - GPU/Met-Ed - TMI:

- 9/80 to Pres. - Director - Startup & Test GPUNC
- 1980 - Manager - Restart Project - TMI-1
- 1978 to 1980 - Station Manager TMI
- 1977/1978 - Station Superintendent & TMI/Unit Superintendent TMI-2
- 1974 to 1977 - Unit Superintendent TMI-2, NRC License (SRO) Unit 1 (1976)
- 1973/1974 - Test Superintendent TMI-1

1965 to 1972 - Newport News Shipbuilding and Drydock Co.:

- Mechanical Systems Engineer - Submarines
- Mechanical Test Engineer - Submarines
- Shift Test Engineer - Submarines
- Shift Test Director - Submarines
- Joint Test Group Chairman/Chief Test Engineer - Submarines
- Assistant Project Manager - Second Overhaul - USS Enterprise (CVAN-65)
- Senior Advisor - Overhaul of USS Long Beach (CGN-9) at Mare Island Naval Shipyard for Naval Reactors (Adm. Rickover)
- Chief Test Engineer - USS California - Newport News Shipyard
- Manager - Nuclear Construction - USS Nimitz and USS Eisenhower

The above positions required passing tests of both shipyards and U.S. Government. These tests were both written exams as well as oral boards for each class of ship power plant including submarine, carrier, cruiser and frigate.

1964/1965

- U.S. Maritime Administration:
- Sailed on merchant ships and worked at various shipyards in Merchant Ship Construction Program. Worked in Washington, D.C. in the Maritime Administration.