

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -x

GENERAL PUBLIC UTILITIES CORPORATION, :  
JERSEY CENTRAL POWER & LIGHT COMPANY, :  
METROPOLITAN EDISON COMPANY and :  
PENNSYLVANIA ELECTRIC COMPANY, :  
:  
Plaintiffs, :

-against-

80 Civ. 1683  
(R.O.)

THE BABCOCK & WILCOX COMPANY and :  
J. RAY McDERMOTT & CO., INC., :  
:  
Defendants. :

- - - - -x

Continued deposition of RONALD STEPHEN

HARBIN, taken by Defendants, pursuant to  
adjournment, at the offices of Davis Polk  
& Wardwell, Esqs., One Chase Manhattan Plaza,  
New York, New York, on Thursday, October 1,  
1981, at 1:15 o'clock in the afternoon, before  
Robert Capuzelo, a Shorthand Reporter and  
Notary Public within and for the State of New  
York.



WALTER SHAPIRO, C.S.R.  
CHARLES SHAPIRO, C.S.R.

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## Also Present:

BARBARA SCOTT,  
Paralegal, Davis Polk & Wardwell, Esqs.

\* \* \*

R O N A L D        S T E P H E N        H A R B I N ,

resumed, having been previously duly sworn

by the Notary Public, was examined and

testified further as follows:

## EXAMINATION BY MRS. VAUGHAN:

Q        Mr. Harvin, you remember that you are  
still under oath from way back when, right?

A        Yes.

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Q The first thing I would like to ask you,  
are you still today employed by Met Edison?

A Yes, I am.

Q In the same job that you were employed in  
at the last session of your deposition?

A Yes.

Q Have you worked for anyone other than those  
individuals that we previously identified before on the  
organization charts? Do you remember that?

MR. MacDONALD: You mean directly reporting  
to somebody?

MRS. VAUGHAN: Mr. Colitz, O'Hanlon,  
Mr. Seelinger, Mr. Miller and Mr. Toole.

A Yes, that is correct.

Q I am only referring now to your employment  
with Met Edison.

You have not worked for anyone other than  
those individuals?

A That is correct.

Q Is it also true that you have not had  
employment with anyone other than Met Edison with  
the exception of the Navy?

A That's correct, with the exception of summer  
employment while I was in college.

1

2

Q One last preliminary question.

3

Have you had discussions with

4

anyone other than counsel with respect to your

5

deposition either before the last deposition session

6

or in between that session and this session?

7

A No.

8

Q No discussion?

9

A No, I have not.

10

Q I have a series of questions, and I can

11

refer to the deposition pages if you want. If you

12

don't necessarily disagree with anything I say,

13

I don't know if you are going to want to take time to

14

look at those pages --

15

A What are the deposition pages?

16

Q The transcript from your previous testimony.

17

You testified at pages 216 and 217 of your deposition

18

that it was your general practice to maintain copies

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of the Current Events-Power Reactors publication.

20

MR. MacDONALD: Let me interject.

21

If we are going to go back over prior

22

deposition testimony or if you are going to refer

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to it directly rather than having him agree that

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that characterization is necessarily correct,

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maybe we can just refer to those two pages and



2           you can refer him to that as to the subject  
3           matter of which you are talking about and then  
4           you can go on and ask whatever you want to.

5           Q       Do you want to take a look at pages 216  
6           and 217?

7           A       Yes.

8                   (Document handed to the witness.)

9           MR. MacDONALD: Do you have a specific  
10          question and line?

11          Q       You also testified at pages 258 to 260  
12          that Nelson Brown asked you to look for information  
13          relating to an event at Davies-Besse and you found past  
14          publications of Current Events-Power Reactors when  
15          you were looking for that.

16                 My question to you is, are there  
17          files which contain issues of Current Events-Power  
18          Reactors?

19          A       Yes, there are files that contain that document.

20          Q       When you say "that document," do you  
21          mean more than one issue of the Current Events-Power  
22          Reactors?

23          A       Yes.

24          Q       How are those files labeled?

25          A       How is the file folder labeled?

1

2

Q That is correct.

3

A I believe it's labeled "NRC Current Events-Power Reactors."

4

5

Q Who maintains those files?

6

A Ron Toole's secretary.

7

Q What is her name?

8

A Pat Schlegel.

9

Q Have you ever been asked to gather information relating to a transient that occurred at Davis-Besse on September 24, 1977?

10

11

A Not that I recall.

12

13

14

Q And your answer would refer to either before the accident at Three Mile Island or after the accident at Three Mile Island, is that correct?

15

A Yes, that is correct.

16

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18

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Q If you want to again refer to your deposition on page 157, you testified I believe that Pat Schlegel, who is Mr. Toole's secretary, keeps a file of some B&W User Group meeting minutes, and that Al Stowe keeps the minutes for those meetings that were held prior to 1980 or for those minutes that were written prior to 1980.

MR. MacDONALD: What is the question?

25

Q How are those files labeled?

MR. MacDONALD: Both Mr. Stowe's and Miss Schlegel's?

MRS. VAUGHAN: That is correct.

A The general practice was to label the files "B&W Users' Meeting," and then the date of the meeting on the file folder.

Q Does Ms. Schlegel keep some of those files?

A Yes, she does.

Q And Mr. Stowe would keep the files prior to 1980?

A I can't be sure of the date.

Q When you testified --

A I testified to the best of my knowledge files prior to 1980. I was really referring to the date because I'm not sure of the date.

Q But it is your understanding that he does have or would maintain files of some previous time?

A Yes, that's right.

Q On page 164 of your deposition you testified that a file was kept for some B&W Users' meeting of memos that you sent out regarding minutes from those meetings.

My question to you is, how would those

2 files be labeled?

3 A I'm sorry, what files?

4 Q The files into which any notes or memos,  
5 rather, that you wrote regarding B&W User Group meeting  
6 minutes would be kept.

7 A Did I say somewhere -- do you see somewhere  
8 that I said that I wrote memos?

9 Q Yes.

10 A Because I don't recall now ever writing any notes  
11 or letters.

12 Q "Question: Would a file be kept of any  
13 memos that you sent out regarding B&W Users' Group  
14 meetings?

15 Answer: I don't know that that was the  
16 general practice. I know that there were some  
17 meetings that that was -- that was done."

18 And my question to you is, how would that  
19 file be labeled?

20 A The general practice at the time was for  
21 any correspondence that I may have generated -- and  
22 I don't remember now having generated any -- that that  
23 correspondence and any correspondence that would be  
24 generated by or to the Unit Superintendent would be  
25 kept in the same file.

2 Q In the same file as the meeting minutes?

3 A That is correct.

4 Q So that those files, that would also  
5 be kept by Ms. Schlegel or Mr. Stowe, depending  
6 on the time?

7 A That was the general practice.

8 Q At page 178 you testified that copies  
9 of Mr. Toole's minutes and anyone else's minutes  
10 from Users Group meetings were maintained.

11 Do you see that testimony?

12 A Yes, I see what you are referring to.

13 Q And my question is the same as the previous  
14 question, and that is, how were those files labeled?

15 A The same way, "B&W Users Meeting," and the date  
16 of the meeting.

17 Q And they are also maintained by either  
18 Ms. Schlegel or Mr. Stowe?

19 A Yes, that is correct.

20 Q In your previous testimony -- and it  
21 appears specifically at page 438 -- you testified that  
22 you did not maintain copies of the Atomic Energy  
23 Clearing House publication.

24 My question to you is, is that still your  
25 testimony today?

2 A Yes, on the ones that were returned to me, that  
3 is still the case.

4 Q That you did not maintain them?

5 A That's correct.

6 Q Do you have any knowledge about those  
7 documents, those copies of the Atomic Energy Clearing  
8 House that were not returned to you?

9 A I believe I testified and it's in my testimony  
10 that at some point in time that document was returned  
11 to Nelson Brown as opposed to being returned to me,  
12 and I don't know what he did with it.

13 Q Do you know if there exists anywhere  
14 else within Met Edison or GPU a file of Atomic  
15 Energy Clearing House publications?

16 A I don't know whether there is or isn't.

17 Q You don't have any knowledge of that?

18 A That's correct.

19 Q Have you had any conversations with  
20 anyone since our deposition about the Atomic Energy  
21 Clearing House publication and whether or not it was  
22 kept or maintained?

23 MR. MacDONALD: About the publication or  
24 about whether or not it was --

25 MRS. VAUGHAN: Let me make it clear.

2

Q About copies of the Atomic Energy

3

Clearing House publications and whether those copies

4

were kept or maintained.

5

A What copies?

6

Q Copies of the Atomic Energy Clearing

7

House publication.

8

Have you had any conversations since the

9

last time you were deposed about the whereabouts of

10

any copies of the Atomic Energy Clearing House

11

publications?

12

A Yes, I have.

13

Q With whom have you had those conversations?

14

A Nelson Brown.

15

Q What has been the content of those

16

conversations?

17

A As I recall, I was in his office and saw one of

18

the documents that was a recent publication.

19

Q Of the Atomic Energy Clearing House?

20

A Yes, that's right.

21

And I made some comment about the fact

22

that he was still receiving that publication, and

23

I don't recall any discussion as to what the disposition

24

was or what he did with them, but there was no

25

discussion at all on any past practices or what was



1  
2 done with past issues after they had been routed or  
3 distributed.

4 Q Are you aware of the fact that for a period  
5 of time in 1977 no one at Met Ed or GPU received  
6 copies of the Atomic Energy Clearing House? That  
7 is that the publication was not sent to anyone at  
8 Met Edison or GPU.

9 A No, I have never heard anyone make a statement  
10 like that or I have no knowledge of that.

11 Q On page 312 of your deposition, you  
12 testified that you do not know of anybody who has  
13 maintained files of past copies of B&W Operating  
14 Plant Service Bulletins.

15 My question to you is, is that still  
16 your testimony today?

17 A Are you referring to the question on page 312  
18 that reads, "Do you know today if there are files  
19 maintained into which this copy of the Operating  
20 Plant Service Bulletin can be found"?

21 Q I think there is more if you go down.

22 A I testified on page 311 that I was unsure  
23 of the title of the document that we were talking  
24 about, and I believe now, since I last testified,  
25 the title is different. I believe it's the same



2 report at least in substance.

3 As far as the question on the top of page  
4 312, my answer to that question and also my  
5 testimony elsewhere in the deposition since the  
6 accident, Jim Seelinger had directed me to implemenet  
7 a program of collecting these documents and  
8 establishing a computer program or a computer -- a  
9 computer program for keeping track of incidents at  
10 B&W plants. At that time I started keeping a file  
11 of this document, and I have that file now.

12 But the question refers to "this copy,"  
13 and depending on what that copy is, I may not have  
14 that copy, but I have some copies.

15 Q I understand, and that is fine.

16 What I am really getting at is, do you  
17 know of anyone who has a file in which are kept back  
18 issues of the B&W Operating Plant Service Bulletin?

19 A Besides myself?

20 Q Besides yourself, what I understand,  
21 it is after the accident. I would be interested in  
22 finding copies that might have been kept that came  
23 out before the accident.

24 A I don't know of anyone that would have copies  
25 of those.

1

2 Q When you say the name is different,  
3 what is the name of the bulletin now as you understand  
4 it?

5 A I don't know what the name is now. There was  
6 an insignificant change from something to the  
7 effect of "Operating Plant Service Bulletin" to  
8 "Plant Status Report," for example.

9 Q Was that changed after the accident?

10 A Yes, I believe it was.

11 Q When Mr. Seelinger asked you to set up a  
12 system -- is that what you said, to set up some kind  
13 of a mechanism by which you would keep track of  
14 events at B&W plants? Is that what you testified  
15 to? Am I correct in that? --

16 A Yes.

17 Q -- did you at that point go back through  
18 the publications that Met Ed was receiving to see what  
19 kind of information they were getting?

20 A No, I didn't have any back issues. At that  
21 point I started saving them.

22 Q But you didn't do any kind of a search of  
23 information that had been obtained in the past or that  
24 was being received by Met Edison?

25 A No, I didn't.

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Q Have you talked to anyone since the last day of your deposition about keeping any back issues of the B&W Operating Plant Service Bulletin or whatever the name of it is now?

A No, I have not.

Q Do I understand you that Pat Schlegel is still the secretary for Mr. Toole and yourself?

A Yes, she is.

Q Who was the secretary before Miss Schlegel?

A There was a temporary secretary for a period of two weeks. I don't recall her name.

Q How about before the temporary secretary?

A Donna Kent.

Q How long was Miss Kent the secretary for the Unit 1 Superintendent and yourself?

A Probably six to eight months.

Q Who was the secretary before Miss Kent?

A Anna Mae Troutman.

Q For what period of time was she the secretary?

A Approximately a year.

Q Who would have been Unit 1 Superintendent while she was the secretary?

A Jim O'Hanlon.

Q Then how about a secretary before her?

2 A I believe it was Debbie Russ.

3 Q Who was the Unit 1 Superintendent when  
4 she was the secretary?

5 A Joe Colitz.

6 Q Was there a secretary before Miss Russ  
7 but after you started working?

8 Are those the only women who have  
9 been secretaries to the Unit 1 Superintendent while  
10 you were there at Met Edison?

11 MR. MacDONALD: Are you talking about  
12 full-time secretaries?

13 MRS. VAUGHAN: Yes.

14 A Yes, full-time secretaries.

15 Q Have there been part-time secretaries?

16 A I believe before Debbie Russ, Bev Hockley was  
17 a secretary that was shared between the Unit 1 and  
18 Unit 2 Superintendents.

19 Q Was that after you started working for  
20 Met Edison?

21 A Before and after.

22 Q On page 317 of your deposition testimony,  
23 you testified that you maintained a file for  
24 Mr. Seelinger which contained notes of his from the  
25 day of the accident.

1  
2 My question is, is that the only file  
3 of Mr. Seelinger's that you did maintain or are  
4 now maintaining since he has left?

5 A Yes, that is the only file.

6 Q Do you know who maintains, if anyone,  
7 any other files of his?

8 A During the period of time that he was Unit 1  
9 Superintendent, he used the Unit 1 Superintendent's  
10 files, and there is correspondence in the files that  
11 are now Mr. Toole's that was written to or by  
12 Mr. Seelinger and those are -- those files are being  
13 maintained by either Pat Schlegel or by Mr. Stowe.

14 Q How about after Mr. Seelinger left or  
15 ceased his employment as a Unit 1 Superintendent,  
16 would all the files have stayed in the Unit 1  
17 Superintendent's office?

18 MR. MacDONALD: He just testified that  
19 some were maintained by Mr. Stowe, unless I  
20 heard wrong.

21 Q Is there anyone else?

22 MR. MacDONALD: You mean aside from that?

23 MRS. VAUGHAN: That's right.

24 A No, I don't know of anyone else.

25 Q You don't know of anyone else to whom he

2 gave files as he gave you the notes from the day of  
3 the accident?

4 A I don't have any knowledge of him giving  
5 files to anyone else.

6 Q Do you have any understanding of what?

7 MR. MacDONALD: If you have a recollection.

8 A No, no recollection.

9 Q No knowledge, no recollection?

10 Have you ever heard anyone say anything  
11 about that?

12 A Not that I recall.

13 Q Why did he give you his notes from the  
14 day of the accident to keep?

15 MR. MacDONALD: Are you asking if there  
16 was a conversation which ensued when he gave  
17 them to him?

18 MRS. VAUGHAN: Whatever. Certainly  
19 Mr. Seelinger must have said something when  
20 he handed it to him or did something or wrote  
21 something or whatever.

22 MR. MacDONALD: You can ask him if he did.  
23 I don't know whether he must have.

24 A He didn't write anything.

25 Q Did he say anything?

1

2 A Mr. Seelinger was at TMI at the time of  
3 the accident and he was involved in some of the  
4 testimony to the various commissions following the  
5 accident, and at the time he terminated his employment  
6 with the company, the files, or the notes that he had  
7 taken the morning of the accident he did not feel  
8 were notes that would appropriately be a part of the  
9 Unit 1 Superintendent's files nor did he feel that  
10 it was appropriate to take them with him to Florida  
11 which is where he moved to, and so he left them with me.

12 Q Did he say anything when he gave them to  
13 you?

14 A I don't recall specifically what he said, but  
15 something to the effect of requesting me to hold on  
16 to them in case any of the information contained in  
17 the notes were ever needed.

18 Q Where were you on the day of the accident  
19 at Three Mile Island?

20 MR. Mac DONALD: I think we went over this.

21 MRS. VAUGHAN: I don't think it is contained  
22 in the deposition. If you can point it out to  
23 me, that is fine, but I have no recollection.

24 A I was at the observation center part of the day.  
25 I was never on site that day.



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2

Q Did you take any notes from that day?

3

A Not that I recall.

4

Q Were you in communication with anyone

5

on site that day?

6

A Not that I recall.

7

Q You have previously testified at pages

8

362 and 363 of your deposition that the Unit

9

Superintendent would maintain a file for some

10

of the GORB meetings and that you would file any notes

11

that you took of these meetings in the Superintendent's

12

file.

13

How is that file labeled?

14

A The general practice was to label the file

15

"Meeting GORB," and then the number of the meeting.

16

They were numbered sequentially.

17

Q Who has kept or is keeping those files?

18

A For some period of time they were kept by the

19

secretary of the Unit 1 Superintendent. I'm not sure

20

that we are continuing that practice.

21

Q If you are not continuing that practice,

22

do you know where they would be kept now or who would

23

keep them?

24

A No, I don't know.

25

MRS. VAUGHAN: Will you please mark this



document, Mr. Reporter.

(Memorandum dated September 14, 1979 from GPU marked B&W Exhibit No. 284 for identification as of this date.)

Q Do you recognize this document?

A Do I recognize it?

Q Does it look familiar to you?

You signed it, is that correct?

A That appears to be my signature.

Q Do you remember writing this document?

A No.

Q You have no recollection of writing it?

A I recall being involved in setting up interviews for these people, some of the people listed there.

Q What was the purpose of the interviews that you were setting up?

A GPU set up an investigative task force to investigate the TMI accident, and the purpose of the interviews was to conduct the investigation.

Q Who was conducting the interviews?

MR. MacDONALD: You are talking about what people?

MRS. VAUGHAN: That's right.

A I don't know who was on the task force. I know

2 Bob Keaton was either in charge of the task force  
3 or coordinated their efforts.

4 Q Do you know whether the interviews were  
5 conducted by GPU or Met Edison employees?

6 A I know that Bob Keaton conducted some of the  
7 interviews and he was a GPU employee. I don't know  
8 who else conducted interviews.

9 Q Do you know whether anyone from outside  
10 Met Edison or GPU conducted any interviews?

11 A No, I don't.

12 Q Do you know whether there were interviews  
13 held other than the ones that are scheduled here  
14 with regard to this same task force?

15 A Yes, I recall that there were.

16 Q Do you recall when they were conducted?

17 A Subsequent to these.

18 Q Do you recall that these were the first  
19 interviews conducted by the task force?

20 A No, I don't.

21 Q Is that your writing in the margins and  
22 down at the bottom?

23 A No, I don't believe it is.

24 Q Do you know how the interviews were  
25 conducted?

2 A What do you mean?

3 Q Were they taped, were they recorded,  
4 was there a stenographer present? Any one of  
5 those ways, do you know how they were conducted?

6 A I believe they were tape-recorded.

7 Q Do you know what happened to the tapes?

8 A No, I don't.

9 Q You don't know the whereabouts of the tapes  
10 now?

11 A No, I don't.

12 Q Do you know whether the individuals who  
13 were interviewed had an opportunity to listen to the  
14 tape and correct any of their statements?

15 A No, I don't.

16 Q Do you know whether the tapes were  
17 subsequently transcribed?

18 A No, I don't.

19 Q Do you know who would know that?

20 A I don't know who would know that, but as  
21 coordinator of the task force, I believe that Bob  
22 Keaton would know that.

23 Q Would Bob Keaton also know where the tapes  
24 are now located?

25 A I don't know.

1

2 Q Were you ever interviewed for this task  
3 force?

4 A No, I wasn't.

5 Q Did you do anything else other than  
6 schedule these interviews with respect to this task  
7 force?

8 A I don't recall that I did.

9 Q Did you have any involvement at all with  
10 the task force, any other involvement with the task  
11 force?

12 A No, I didn't.

13 Q When you reviewed an Atomic Energy Clearing  
14 House publication or a Current Events-Power Reactors  
15 publication, did you look for those items which  
16 would affect nuclear safety?

17 A Part of my review was to look for items  
18 that might pertain to nuclear safety.

19 Q How did you determine whether an item  
20 involved nuclear safety?

21 A Could you define what you mean by "nuclear  
22 safety"?

23 Q Why don't you tell me what you understand  
24 it to be from your previous answer.

25 A Something that has to do with the design or

operation or maintenance of a component or system that supports the operation of the reactor itself.

Q That is how you would define "nuclear safety"?

A You asked me the question did I look for things in those two documents that dealt with nuclear safety, and in that context, that is the way I define it.

Q In what context?

A In the context of reviewing those documents, I would look for things that had to do with the design, operation, maintenance.

Q In 1977 and in early 1978, or throughout 1978 -- we won't limit it to early 1978 -- what was your understanding of the significance of an event, if you had any, which led to saturation in the reactor coolant system?

Mr. MacDONALD: Let's have a base from which you can ask your question.

MRS. VAUGHAN: We can ask him if he knew of any events -- that doesn't bear on whether or not he understood the significance of an event -- any event that would lead to saturation.

I am just looking for his understanding of the significance of any event which would lead

1  
2 to saturation in the reactor coolant system  
3 in 1977 and 1978.

4 A To the best of my recollection, the TMI-2  
5 accident was the first incident that I had ever  
6 heard of in which there was saturation in the reactor  
7 coolant system in a nuclear plant.

8 Q What was your understanding when you heard  
9 of it in 1979 then?

10 MR. MacDONALD: Understanding as to what?

11 MRS. VAUGHAN: Saturation in the reactor  
12 coolant system.

13 A I'm not sure what you mean.

14 Q Did that strike you as something  
15 significant, that saturation occurred in the  
16 reactor coolant system?

17 A Yes, it did.

18 Q Did it strike you as something that  
19 should not have happened?

20 A Not with water in the pressurizer.

21 Q Did it strike you as an abnormal occurrence?

22 A Yes, very abnormal.

23 Q Is it one that affects the safety of the  
24 plant?

25 A I'm not really qualified to make a statement like

1  
2 that.

3 Q So you are not qualified to judge whether  
4 an event affects the safety of a plant or not?

5 A There are a lot more variables -- I'm not willing  
6 to agree that the saturation, strictly saturation in  
7 the reactor coolant system has a negative effect on  
8 nuclear safety.

9 Q Saturation in the context of a transient  
10 occurring, does that have some consequence with  
11 respect to nuclear safety?

12 MR. MacDONALD: Are we talking about the  
13 TMI-2 accident or are you asking the witness'  
14 opinion?

15 MRS. VAUGHAN: I am not asking for his  
16 opinion.

17 I am asking for his understanding of the  
18 occurrence of the saturation in 1979 at the time  
19 of the accident. I am not talking about the  
20 day after the accident. I am talking about  
21 at the time of the accident or before the  
22 accident.

23 MR. MacDONALD: What is the pending  
24 question?

25 (Question read by the reporter.)

1  
2 Q The pending question is whether that  
3 would be considered, if there were saturation in the  
4 context of a transient, saturation in the reactor  
5 coolant system, would you consider that to involve  
6 nuclear safety?

7 MR. MacDONALD: You are talking about the  
8 day before the accident? You said up until the  
9 day of the accident.

10 MRS. VAUGHAN: At the time of the accident.

11 MR. MacDONALD: Ask if he has any  
12 recollection of that at the time of the accident.

13 MRS. VAUGHAN: You can go back and start  
14 at the beginning.

15 Q In 1977 or 1978 what understanding did  
16 you have with respect to the occurrence of saturation  
17 in the reactor coolant system during the course of  
18 a transient?

19 MR. MacDONALD: Granted he gave you that  
20 answer.

21 MRS. VAUGHAN: No, he didn't. He started  
22 and we ended up at Three Mile Island, the date  
23 of the accident.

24 MR. MacDONALD: He told you he didn't have  
25 any understanding at that point in time that



1  
2 saturation could occur in the reactor coolant  
3 system; the first time he heard about it was  
4 TMI.

5 MRS. VAUGHAN: I am asking what he would  
6 have understood of the significance of it.

7 Q If your answer is that you didn't understand  
8 saturation and what that meant in the reactor coolant  
9 system until the accident at Three Mile Island,  
10 that is one thing.

11 Is that your answer?

12 A No.

13 Q What is your answer?

14 I will repeat it once more.

15 A Yes, because I really do feel that you have  
16 asked about three different questions.

17 Q In 1977 and 1978 what was your understanding  
18 of the significance of the occurrence of saturation  
19 in the reactor coolant system during a transient?

20 MR. MacDONALD: I don't think there is a  
21 foundation for that. I object.

22 Q Did you have an understanding?

23 MR. MacDONALD: He told you.

24 A I had considered the possibility of saturation  
25 in the reactor coolant system not necessarily during

1977 and 1978 but before the TMI-2 accident, but it was my understanding that that could not happen with water in the pressurizer.

Q Was it your understanding if it did occur it was an abnormal event?

A Any thoughts that I would have had or that I had about saturation in the reactor coolant system were in the context of that being an abnormal occurrence.

Q Was it your understanding that the occurrence of saturation in the reactor coolant system during the course of a transient affected nuclear safety?

MR. MacDONALD: Just that alone?

MRS. VAUGHAN: That alone.

Q In 1977 or '78, in the course of a transient.

A Or before then?

Q Yes. At least as of then, you had an understanding?

A I'm sorry, what is the question?

MRS. VAUGHAN: Could you read it back, please.

(Question read by the reporter.)

A I don't recall specifically what my definition

1  
2 at the time was of nuclear safety, an effect on  
3 nuclear safety, but it was my understanding that  
4 those conditions, saturation conditions in the reactor  
5 coolant system would imply a detrimental effect on the  
6 safety of the primary plant.

7 Q In 1977 and 1978 what was your  
8 understanding, if you had any understanding, of the  
9 significance of a PORV which failed open? In other  
10 words, a PORV that didn't close properly.

11 A I don't recall that I had any understanding.

12 Q In 1977 and 1978 you had never heard  
13 of a PORV that failed open?

14 MR. MacDONALD: He already told you  
15 that.

16 A I don't recall whether I did or didn't.

17 Q In 1977 and '78, within Unit 1, who was  
18 the person most knowledgeable about PORVs and whether  
19 they would fail open or closed?

20 A I don't know.

21 Q Who was most knowledgeable in 1977 and  
22 '78 within Unit 1 about events which involved a loss  
23 of feedwater?

24 A I don't know.

25 Q Who was most knowledgeable during that

2 same period of time, 1977 and 1978, within Unit 1  
3 about LOCAs, loss of coolant accidents?

4 A I don't know.

5 Q Do you know who was most knowledgeable  
6 about small-break LOCAs?

7 A No.

8 Q When you say you don't know, do you mean  
9 that you can't remember?

10 A No, I mean that as I recall I never knew.

11 Q In 1977 and 1978 what, if any, understanding  
12 did you have about the significance of the quench tank  
13 line or the rupture disc of a plant blowing?

14 A I don't recall that I had any knowledge of that  
15 possibly happening.

16 Q Are you familiar with the quench tank,  
17 when I use that term?

18 A Yes, I am now.

19 Q When did you become familiar with that  
20 term?

21 A To the best of my recollection, after the TMI-2  
22 accident.

23 Q Are there main files at Met Ed -- I use  
24 those words in quotes, "main files" -- or main file  
25 storing or central filing?

1  
2           You used that term on several  
3 occasions in your deposition, and I am trying to  
4 figure out what it means or where those main files  
5 or central filing, whatever you understand by those  
6 words.

7       A     By the words "main files"?

8       Q     Yes.

9           Does that imply anything to do?

10      A     No, not the words, "the main files." There was  
11 a central filing system in Redding for correspondence  
12 generated in Redding which was the home office for  
13 the company before the accident.

14      Q     Is there any kind of a central filing  
15 system on the Island or central filing place?

16      A     Not to my knowledge.

17      Q     Is there one at Parsippany?

18      A     I don't know.

19      Q     In 1976 when you assumed your  
20 responsibilities as an assistant to the Unit 1  
21 Superintendent, did you view your responsibilities  
22 as reviewing his mail as administrative?

23      A     Primarily.

24      Q     Do you view your responsibilities in that  
25 way today?

2 A To some extent, yes.

3 Q Does your answer indicate that you have  
4 changed your view of your responsibilities since the  
5 time you first undertook them in 1976?

6 A Yes.

7 Q How has your view of your responsibilities  
8 changed?

9 A In general, they have become more technical  
10 in nature.

11 Q How have they become more technical in  
12 nature?

13 A I'm better qualified technically today than I was  
14 five years ago to review technical documents.

15 Q How have you become better qualified?

16 A Do you mean what school have I attended?

17 Q How are you better qualified today than  
18 you were five years ago?

19 A I know the plant better; I know the procedures  
20 better; I know more about the operation of the plant.  
21 That is three examples.

22 Q Did the manner in which you reviewed the  
23 Current Events-Power Reactors publication change in  
24 any way after the accident at Three Mile Island?

25 A Which document?

2 Q Current Events-Power Reactors.

3 A No, it hasn't.

4 Q Do you review that publication in the  
5 same manner as you did before the accident?

6 A Yes, I do.

7 Q Would you take a look at what was marked  
8 B&W Exhibit 75.

9 Have you ever seen this document before?

10 A No, I don't believe I have.

11 Q Then I take it you wouldn't know who  
12 prepared it.

13 A No, I don't.

14 Q Do you recognize the handwriting in the  
15 margins?

16 A No, I don't.

17 Q Look at page 1, the second paragraph,  
18 about two-thirds of the way down a sentence begins on  
19 the right-hand side, "Recent reinstituted NRC I&E  
20 information notices."

21 Are you familiar with those information  
22 notices?

23 A Yes.

24 Q Do you know when they were instituted?

25 A I believe approximately 1978.

2 Q So they would have been instituted  
3 before the accident?

4 A I believe that they were.

5 Q What are NRC I&E information notices?  
6 Would you describe them?

7 A They are descriptions of events or findings at  
8 either power reactors or possibly fuel fabrication  
9 plants or in other businesses that deal with nuclear  
10 material, that are intended to disseminate  
11 information to other licensees about those problems  
12 or findings.

13 Q Is that publication still published today?

14 A Yes. An information notice generally comes  
15 out for each event and they are numbered sequentially.

16 Q And they are in addition to the bulletins,  
17 circulars, and notices, or is the information notice  
18 the last part of those notices?

19 A That's right, it's the last part.

20 Q On page 2, the first full paragraph, the  
21 second sentence -- actually the second line -- "Copies,  
22 although no longer reviewed by the Generation Review  
23 Committee (GRC) are reviewed by both applicable  
24 site and corporate staff members."

25 I should note that the copies that are



1  
2 being referred to have been called the Commerce  
3 Clearing House document.

4 Do you know why the Commerce Clearing  
5 House document was no longer reviewed by the Generation  
6 Review Committee?

7 A I never heard of that document.

8 Q If we said that it was the Atomic Energy  
9 Clearing House document, do you know that that document  
10 was at some point no longer reviewed by the Generation  
11 Review Committee?

12 MR. MacDONALD: Are you assuming it was  
13 reviewed at some time?

14 MRS. VAUGHAN: That is fine.

15 A I don't know that it was ever reviewed by the  
16 GRC.

17 Q You don't know that it stopped being  
18 reviewed by the GRC?

19 A That is correct.

20 Q Or that the GRC stopped reviewing it?

21 Do you know whether site and corporate staff  
22 members reviewed the Atomic Energy Clearing House  
23 document?

24 MR. MacDONALD: What do you mean by "site  
25 and corporate staff members"?

1  
2 MRS. VAUGHAN: As used in this document.

3 MR. MacDONALD: I don't know that that  
4 has any meaning to him.

5 MRS. VAUGHAN: If it doesn't, he can say  
6 that.

7 A I testified earlier today that I had discussions  
8 recently with Nelson Brown in which he indicated  
9 to me he was still reviewing the Atomic Energy Clearing  
10 House document.

11 I don't know of any other member of the  
12 site of corporate staff that does that or that doesn't.

13 Q This also says, "The GRC is well informed  
14 of any significant events by the time they appear  
15 in the Clearing House document."

16 Do you have any knowledge about how the  
17 GRC is informed of significant events that would  
18 occur that would be reported in the Clearing House  
19 document? In other words, events at other facilities.

20 MR. MacDONALD: You mean if it is at all  
21 informed?

22 MRS. VAUGHAN: Yes.

23 A If it is informed, I don't know how.

24 Q Have you ever had any dealings with the  
25 Generation Review Committee?

1

2 A Yes, but not in areas that pertain to events  
3 at other nuclear power plants.

4 Q In what areas have you had dealings  
5 with them?

6 A I don't recall.

7 Q You do recall it hasn't been in areas  
8 involving other plants?

9 A That's right, incidents at other plants.

10 Q How about incidents involving Three Mile  
11 Island itself; have you had any dealings with the GRC  
12 in that regard?

13 A No, not that I recall.

14 Q In the third full paragraph, the one  
15 beginning, "The General Office Review Board" --

16 MR. MacDONALD: On page 2?

17 MRS. VAUGHAN: Yes, the same page.

18 Q -- the fourth line there is a sentence  
19 which begins, "Consultants are commonly and  
20 consistently utilized both as advisors and members  
21 to provide the Board with additional expertise in  
22 many areas of specialized industry experiences."

23 Do you have knowledge of consultants  
24 being used by the General Office Review Board?

25 A Yes. I testified to that in a previous

deposition.

Q Who are those consultants?

A B&W is one. There is one, I believe, Mr. Lowe of Hickard, Lowe & Garrick which is an attorney or law firm in Washington, and another is Mr. Lou Raddis, and I believe that he was employed by Carolina Power & Light.

Those are three examples, and I don't know -- I'm not stating that they are consultants now, but that they have been.

MRS. VAUGHAN: Why don't we take a break.

(Recess taken.)

BY MRS. VAUGHAN:

Q Would you take a look at B&W Exhibit 76, please. It is dated 6-3-79 and entitled "Training Department Notifications."

Have you ever seen this before?

A No, I haven't.

Q I take it you don't know why it was prepared?

A I don't know why.

Q It was prepared in June of 1979.

Does that refresh your recollection about anything that was going on with respect to gathering

2 sources of information that were received by Met Ed?

3 A No.

4 Q If you look next to Item B under Roman  
5 numeral I, about six or seven lines down it says,  
6 "Send directly to the Training Department from the  
7 NRC data system."

8 Are you familiar with that system?

9 A No, I never heard of NRC data system.

10 Q Before you read it here?

11 A That's right.

12 Q At the very bottom of the first page,  
13 "Depending on the size of the routing list" -- and we  
14 are talking about the Clearing House document --  
15 "they are received within two weeks of receipt at the  
16 station. Presently the initial reviewer is W. R. Gross."

17 Who is W. R. Gross, do you know?

18 A I believe that is Bill Gross.

19 Q What was his position in 1979, if you know?

20 A I don't know what it was.

21 Q Do you know what he does now?

22 A He works at the observation center in the  
23 Public Relations Department.

24 Q Do you know how long he has had that job?

25 A No, I don't.

2

Q Do you know whether he started in that position after the accident at Three Mile Island?

3

4

A No, I don't.

5

6

Q Do you see on the second page next to Roman numeral II, "Current events of operating reactors," is how Mr. Brown has it.

7

8

This document was sent to John Peters.

9

Who is John Peters, if you know?

10

11

12

13

14

A He was an individual that had responsibility for some of the things that I accepted responsibility for when I was first employed by the company, and he terminated his employment prior to my starting employment with the company.

15

16

Q Do I understand then that he is no longer employed by Met Ed?

17

18

A That is correct.

19

20

Q Or GPU?

21

A No, I don't.

22

23

24

Q The statement is made that, "We have not received a copy of that document for about a year." "We" meaning the Training Department.

25

Do you know why they didn't receive a

1  
2 copy of this document for about a year?

3 MR. MacDONALD: I'm not sure who the "we"  
4 refers to. I wouldn't want Mr. Harbin to  
5 verify the "we" in a document he hasn't read or  
6 doesn't know that it is necessarily coming from  
7 Mr. Brown. There may be something on the last  
8 page that says, "Brown," but I don't think that  
9 necessarily means that the signature there,  
10 the "we", is necessarily the Training Department

11 Q Do you know that the Training Department  
12 didn't receive a copy of current events for  
13 operating reactors for about a year?

14 A No.

15 Q Did Mr. Brown ever mention that to you?

16 A No, I didn't know they ever received it, or  
17 they didn't receive it.

18 Q When you see "Current events of operating  
19 reactors," do you understand that to be something  
20 in Current Events-Power Reactors?

21 A From reading this document, it appears that  
22 he implied in writing that to mean Current Events-Power  
23 Reactors.

24 Q Are you familiar with any publication  
25 called "Current Events of Operating Reactors"?



2 A As I testified earlier in the deposition,  
3 I believe that the name of the document, "Current  
4 Events-Power Reactors," has changed similar to the  
5 way that B&W's Weekly Newsletter has changed, and  
6 I don't know the other specific title.

7 Q Roman numeral VI, there is a reference  
8 made to "Change mods."

9 Does that phrase mean anything to you,  
10 "Change mods"?

11 A Yes, it does.

12 Q What is it?

13 A The company has a procedure for proposing and  
14 approving a modification to the plant and part of  
15 the procedure consists of a form that requires the  
16 necessary approvals for the change to be made,  
17 and item VI I believe is referring to that document.

18 Q To which document, the document that you  
19 have to sign?

20 A That is correct, the document that describes  
21 what the change is and requires the necessary approvals.

22 Q How does it differ from what is referred  
23 to in Roman numeral IV and Roman numeral V above,  
24 that is, a temporary change notice and a permanent  
25 change request?

1

2 A Those are changes to procedures, either  
3 temporary or permanent and item VI deals with hardware  
4 changes. That is the basic difference.

5 Q This document says, "We received copies  
6 of the change mod requests if stamped for training  
7 as deemed by the Unit Superintendent. (I believe - or  
8 it may be the Supervisor of Maintenance.)"

9 Do you know whether it is the Unit  
10 Superintendent who would stamp the document?

11 MR. MacDONALD: At what time?

12 MRS. VAUGHAN: In June of 1979.

13 A I don't know what it was then.

14 Q Do you know what it is now?

15 A No.

16 Q Did you ever know what it was?

17 A Two or three months ago approximately I knew it  
18 was the Unit Superintendent.

19 Q Do you know that it has changed since then?

20 A I don't know that it has since then.

21 Q Look at the next page next to Roman numeral  
22 VII, "Technical specification changes." There is  
23 reference in the fourth line of that paragraph to "Key  
24 control copy."

25 What is a key control copy, if you know?

1

2

MR. MacDONALD: Aside from the way Mr.

3

Brown may have referred to it, whether he ever

4

heard of key control copy?

5

MRS. VAUGHAN: Absolutely.

6

A Could you please repeat the question?

7

Q What is a key control copy, if you know?

8

What is meant by the phrase, "Key control copy"?

9

A I'm not sure that key control copy as I

10

once knew them exist now, but at one point in time my

11

understanding was that a key control copy was a

12

copy of the tech specs that was held by an individual

13

or department in which it was deemed necessary for

14

them to have a current copy of the tech specs and

15

there were restrictions, procedural restrictions on

16

how soon after a tech spec change had been approved

17

by the NRC, how soon that copy would have to be

18

updated to reflect those changes.

19

Q Do you see next to Roman numeral VIII

20

a reference to, "B&W Users Group meeting notes and

21

bulletins"?

22

A Yes.

23

Q Do you have any understanding of "Users

24

Group meetings notes and bulletins"?

25

A As a general rule, when a B&W Users Group

2 meeting was attended by a representative of the  
3 company, that representative issued notes following  
4 the meeting or a summary of what took place in the  
5 meeting. Those are the only notes. I don't know  
6 what the term "bulletins" refers to.

7 Q Do I understand from your earlier  
8 testimony that those notes, if filed, should be  
9 found in the file that refers to that Users Group  
10 meeting?

11 A That was the general practice, to file them  
12 there.

13 Q Would those notes be disseminated to other  
14 people? Would they be publicly available within  
15 Met Ed?

16 A I don't know that.

17 Q On the last page of this exhibit, it is  
18 marked Roman numeral VIII, I think it is a mistake.  
19 I think it should be IX.

20 "Simulator Group," does that phrase have  
21 any meaning to you?

22 A No.

23 Q You have never heard it used before?

24 A The term "Simulator Group"?

25 Q Yes.

1

2 A That's correct.

3 Q Are you familiar with training coordinators  
4 from other sites? Do you know any?

5 A No, I don't.

6 Q Do you know whether anyone at Met Ed  
7 or GPU reviewed for any purpose operating  
8 experiences at other plants?

9 MR. MacDONALD: In terms of publications  
10 put out or actually went to the plants to see  
11 their charts or --

12 MRS. VAUGHAN: Any way. We can start with  
13 the publications.

14 MR. MacDONALD: I think he has gone through  
15 that.

16 A Gee, that has been --

17 MR. MacDONALD: Anybody else aside from  
18 himself?

19 MRS. VAUGHAN: Yes.

20 A We just looked at a piece of correspondence  
21 that Nelson Brown wrote.

22 Q That is one.

23 Do you know anyone else that hasn't been  
24 mentioned?

25 A I know the Unit Superintendent has.

2

Q Would that be the Unit Superintendent for Unit 2 as well as the Unit Superintendent for Unit 1?

3

4

A I don't know about the Unit 2 Superintendent.

5

6

Q So there would be you and Mr. Brown and the Unit Superintendent?

7

8

9

MR. MacDONALD: Are you talking about on a regular basis or whoever picked up a piece of paper to review it?

10

11

12

13

14

15

MRS. VAUGHAN: I am talking on a regular basis. Not just somebody who might accidentally pick up a piece of paper and say, "Oh, look, look at this." But somebody who had, as their responsibility, the review of operating experiences at other plants.

16

17

18

A I talked about Dave Carl in earlier testimony. I have talked about the Plant Analysis Group which was formed since the accident.

19

20

21

Q Both Mr. Carl's responsibilities and the Plant Analysis responsibilities are subsequent to the accident, is that right?

22

23

A I don't recall when Mr. Carl's responsibilities -- when that first became a responsibility of his.

24

25

Q My recollection of your testimony was that he now reviews the Atomic Energy Clearing House

documents.

Does he do anything other than that?

A I don't know that he does that now. He took that over from me and to the best of my knowledge that was the only thing that he reviewed, the only document.

Q Is that the only responsibility that you think of when you think of him in terms of operating experiences at other plants, in terms of reviewing?

A Yes.

Q Is there anyone else?

MR. MacDONALD: A point of clarification.

Do you mean to exclude people who were cc'd or routed documents?

MRS. VAUGHAN: I mean to exclude them.

Q To make it a little easier, I'm really focusing on the time before the accident at Three Mile Island.

A There were people in the Licensing Department -- I don't recall their names -- that reviewed NRC, in general, NRC publications. I don't recall any others.

Q Is Nelson Brown at the Island or is he at Redding or Parsippany?

MR. MacDONALD: Currently?



1

2

MRS. VAUGHAN: Right now.

3

4

5

A Right now he is located near the Island in a new training center which is by the observation center.

6

7

Q Prior to being at that location, where was he?

8

A On site.

9

10

Q Has he been on site for as long as you have been on site?

11

A Yes, I believe he has.

12

13

Q Are you familiar with anyone by the name of Brown who was at Redding in 1977 and 1978?

14

A Not that I recall.

15

16

Q Who was Mr. Barton? Are you familiar with that name, B-a-r-t-o-n?

17

A John Barton?

18

Q I don't have his first initial.

19

A I know of a John Barton.

20

Q What is he? What position does he hold?

21

A I don't know the title, but --

22

Q Do you know the substance of what he does?

23

A The substance is Director of Operations in

24

Unit 2.

25

Q And that is his current position?

2 A Yes.

3 Q How about Mr. Hetrick, do you know who he  
4 is?

5 A Yes.

6 Q Are you familiar with him?

7 A Yes.

8 Q What is his job position or the substance  
9 of what he does?

10 A I don't know.

11 Q Is he in Redding?

12 A I don't know.

13 Q You don't have any idea what he does?

14 A The last time I heard anything related to what  
15 he does, he was in Redding. That was approximately a  
16 year ago.

17 Q Do you have any recollection, just  
18 generally? Was he in the Accounting Department or  
19 the Technical Department or the library or management?

20 A I don't know what department.

21 Q How about Mr. Wayne in Parsippany? Do you  
22 know anyone by that name?

23 A No, I do not.

24 Q And a Mr. Lee.

25 A Yes, I have heard the name.

1

2

Q Have you ever met him?

3

A I think I have.

4

Q Do you know what position he holds or  
what his job function is?

5

A No, I don't.

6

Q Not even generally?

7

A No.

8

I'm sorry; Engineering.

9

Q How many libraries do you have access to  
within Met Ed, corporate libraries?

10

MR. MacDONALD: How many there are or  
how many he can walk to?

11

MRS. VAUGHAN: How many are there.

12

A I know there are more, but there are two that  
I know of.

13

Q Which two are they?

14

A One at TMI and one in Parsippany.

15

Q Do you know whether there is one in  
Redding?

16

A I know there once was.

17

Q Do you have any dealings with the library  
in Parisppany from the perspective of you being an  
assistant to the Unit 1 Superintendent?

18

A No. Anything I have to do with the library,

2 I deal through the library staff at TMI.

3 Q So, if you want to get a publication or  
4 some information, you ask the staff on the Island  
5 and they take care of your request?

6 A That's correct.

7 Q Do you know anything about the library  
8 in Parisppany? Do you know how large it is or  
9 what kinds of materials they get?

10 A As I discussed in an earlier deposition, at one  
11 time I got a publication from the Parsippany library  
12 called "Nuclear Power Experiences." I no longer get  
13 that and now I don't deal with them at all.

14 Q Do you know who the librarian is at  
15 Parsippany?

16 A I don't now.

17 Q Did you know who the librarian was at one time?

18 A I believe her last name was Sayers.

19 Q What period of time was she the librarian?

20 A Some time during 1979.

21 Q Do you know whether there was a different  
22 librarian before that or you just didn't have any  
23 contact with the librarian before that?

24 A I didn't know there was a librarian before that.

25 Q In 1977 and 1978, you didn't know there

1  
2 was a librarian in Parsippany?

3 A That's correct.

4 Q Do you know who the librarian is on the  
5 Island?

6 A Today?

7 Q Yes.

8 A I believe it's Joan Parrick.

9 Q How long has she been the librarian?

10 A Approximately a year and a half.

11 Q Who was the librarian before she was the  
12 librarian?

13 A It's my understanding that she established the  
14 library.

15 Q There was not a library before then?

16 A Not that was called a library.

17 Q What was it called?

18 A Well, there were a lot of documents that she  
19 now maintains that were maintained at various locations  
20 on site.

21 Q Did she establish the library after the  
22 accident?

23 A I said she has been employed approximately a  
24 year and a half and that she established it when she  
25 came.

2 Q In point of fact, was that after the  
3 accident?

4 A Yes, it was.

5 Q Are you familiar with the library in  
6 Redding?

7 A It's my understanding there is no longer a  
8 library in Redding.

9 Q When did there cease being a library in  
10 Redding?

11 A Approximately a year ago.

12 Q Again, after the accident?

13 A Yes.

14 Q Do you know why there is no library there?

15 A Because -- it's my understanding there is no  
16 longer a staff there for a library to support.

17 Q Do you know who was the librarian at  
18 Redding before they closed it?

19 A Debbie Bossler.

20 Q Do you know how long she was the  
21 librarian?

22 A No, I don't.

23 Q Would you ever, prior to there being a  
24 library established at Three Mile Island, get any  
25 publications or notices from either the library at

1

2 Parsippany or the library at Redding?

3

4 I am speaking now of just general  
5 notices to bring you up to date on what kinds of  
6 publications they carried.

6

MR. MacDONALD: Are you asking did he?

7

MRS. VAUGHAN: Did he, yes.

8

A When?

9

Q Before there was a library established on  
10 the Island, in other words, for that period of time  
11 for which there was a library at Parsippany and a  
12 library at Redding, did either one of those libraries  
13 ever send you notices or bulletins or any information  
14 about the kinds of materials they carried?

15

A Yes, they did.

16

Q Was that done on a regular basis?

17

A As I recall, it was done on an irregular basis.

18

Q Would they send you something, a memo,  
19 telling you what they had or would they send you the  
20 actual document?

21

A They would send me a listing of what they had.

22

Q Apart from the "Nuclear Power Experience"  
23 publication, did you ever request any publications of  
24 them?

25

A That is the only publication I ever recall



1  
2 requesting from Parsippany.

3 I also recall receiving from Parsippany  
4 a computer run on -- a computer run listing  
5 publications on control room design after the  
6 accident, and those are the only two things that  
7 I ever recall requesting from the Parsippany  
8 library.

9 From the Redding library, I recall  
10 requesting usually publications like "Nuclear News,"  
11 general trade publications.

12 Q Would you request that they be sent to  
13 you on a regular basis?

14 A Yes.

15 MRS. VAUGHAN: Off the record.

16 (Discussion off the record.)

17 BY MRS. VAUGHAN:

18 Q Mr. Harbin, would the Generation Library  
19 be the name of the only library at Redding or  
20 is that a different library from the one that you  
21 were referring to?

22 A I believe that's the same library.

23 Q So, if I see "Generation Library,"  
24 I can assume that is just the one?

25 A The one that I have been referring to as the

Redding.

Q Do you have any knowledge of two libraries?

A No.

Q How about the technical library at Parsippany, do you understand that to be the one and the same library you have been referring to, or is there a second library at Parsippany?

A It's my understanding that there is only one library.

Q And that would be the technical library?

A I don't know that I have ever -- I don't recall ever hearing it referred to that way.

Q Are you familiar with someone by the name of Gary Broughton?

A Yes, I am.

Q How are you familiar with him?

A I've talked to him. He's, in the past, been involved with GORB meetings. He's been involved in computer analyses of transients.

Q When you say, "He's been involved in computer analyses of transients," you mean transients that have occurred at Three Mile Island?

A Yes. It's my understanding that he was involved in that and other transients.

2 Q Is he still in Parsippany today?

3 A Yes, I believe he is.

4 Q Do you understand that he is the Safety  
5 and Licensing Manager today?

6 A I don't know what his title is today.

7 Q Do you understand that the functions that  
8 he performs are those related to safety and licensing  
9 today?

10 A I didn't know that he was involved in licensing.

11 Q But you did know that he was involved in  
12 safety?

13 MR. MacDONALD: Safety as a section or unit?

14 MRS. VAUGHAN: Safety and Licensing  
15 Manager is what he is called.

16 A That title doesn't mean anything to me.

17 Q Do you know someone named L. B. Shattuck?

18 A I have never heard that name before.

19 Q How about with respect to Mr. Lee, if I  
20 told you it was Robert B. Lee, is that somebody  
21 different from who you were thinking of before, or  
22 does that refresh your recollection as to Mr. Lee?

23 A That is not the Mr. Lee that I was thinking  
24 about earlier.

25 Q Do you know this Robert B. Lee?

2 A I'm not sure. I don't know.

3 Q How about Patrick Walsh?

4 A Yes, I referred to him previously.

5 Q Who is he?

6 A I believe his title is Plant Analysis Manager.

7 Q That is his present title?

8 A Yes, I believe it is.

9 Q Is his office located in Parsippany?

10 A Yes, I believe it is.

11 Q W. R. Correll, do you know him?

12 A No.

13 Q If I told you that he was the Records  
14 Management Coordinator, does that refresh your  
15 recollection?

16 A No.

17 Q How about Mr. E. G. Wallace, do you know  
18 him?

19 A Yes, I do.

20 Q What do you understand his function is?

21 A He's the Licensing Manager in Parsippany.

22 Q Does he have anything to do with Three  
23 Mile Island?

24 A Yes.

25 Q What is that?

2 A He's a GPU employee and he's in the Licensing  
3 Department for the company and the employees at  
4 Three Mile Island are operators of the TMI-1 nuclear  
5 plant.

6 Q Do you have contact with him frequently?

7 A Not frequently.

8 Q How often do you have contact with him?

9 A Verbal contact?

10 Q Verbal or written.

11 How often do your functions come into  
12 contact with his job functions?

13 A On the average once every two months.

14 Q In what sense?

15 A I don't recall the last specific thing that  
16 we worked -- or that we discussed.

17 Q Was he the Licensing Manager in 1977 and  
18 1978?

19 A I don't know.

20 Q Mr. R. L. Wayne, are you familiar with him?  
21 I think we have gone over his name.

22 A I have never heard that name before. I don't  
23 recall it.

24 Q You don't know him?

25 A No.

Q Quality Assurance Manager doesn't refresh your recollection?

A No.

Q Do you know Mr. LeRoy Harding?

A Yes.

Q What is his position with Met Ed?

A He's a Supervisor in the Licensing Department in Parsippany.

MRS. VAUGHAN: Please mark this as B&W Exhibit 285.

(Copy of document entitled "GPU Service Corporation Information Services Division, Div. 50" marked B&W Exhibit No. 285 for identification as of this date.)

Q Have you had a chance to look at B&W Exhibit 285?

A Yes.

Q It is entitled "Information Services Division, Division 50" and is dated 4/1/79.

What is the Information Services Division, do you know?

A My understanding of that Division has always been that they deal with the service aspects of any computer programming or computer programs for the

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company.

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Q So then it is not meant to imply in any way that it has anything to do with getting information out to the various utilities within the GPU organization?

A It's my understanding that they don't have anything to do with that.

Q And you have never had any contact with anyone within this division for that purpose?

A That's correct.

Q Is that division still within the organizational structure as you understand it today, the Information Services Division?

A Yes, within the GPU organization.

MRS. VAUGHAN: Let's mark the next document as B&W Exhibit 286.

(Copy of document entitled "GPU Service Corporation Administration Division, Div. 20" marked B&W Exhibit No. 286 for identification as of this date.)

Q Would you look at what has been marked as B&W Exhibit 286 entitled "Administration Division, Division 20," and dated 4/20/79.

Do you see something marked "System Librarian," and then you go over and see W. F. Sayers?



Do you see that?

A Yes.

Q Is that the Ms. Sayers that you were referring to before?

A Yes, I believe it is.

Q Underneath you see "Librarian, J. A. Temple."

Do you know who that is?

A I don't recall hearing that name before.

Q Do you know whether that librarian would be in Redding or Parsippany or whatever?

A No.

I see the chart is labeled "GPU Service Corporation, Administration Division." It is my understanding that anything in Redding at the Generation Division would have been Met Ed. So that I would assume that the people on this chart were in Parsippany.

Q Does the location tell you anything? Do you see where it says, "Location," and then there are numbers?

A No, I don't know what that means.

Q How about the building symbols?

A I've never seen that before or noticed that designation.

1  
2 MRS. VAUGHAN: This will be 287.

3 (Copy of document entitled "GPU Service  
4 Corporation Communications Division, Div. 80"  
5 marked B&W Exhibit No. 287 for identification  
6 as of this date.)

7 Q Do you see B&W Exhibit 287 marked  
8 "Communications Division, Division 80, GPU Service  
9 Corporation"?

10 A Yes.

11 Q What does the Communications Division  
12 do, if you know?

13 A What do they do now?

14 Q This is dated 4/1/79, so we can start  
15 with that.

16 What did they do then?

17 A It was my understanding then that their primary  
18 function was interfacing with the public and with  
19 political representatives of the public.

20 Q Is that your understanding now?

21 A I understand now that that division does more  
22 than that now.

23 Q What does it do now?

24 A Let me clarify that.

25 I know more specifically some more specific

1  
2 tasks that they perform now. For example, issuing  
3 press releases, publishing employee type information  
4 through newsletters. They are in charge of the  
5 observation center. Still, in general, they deal  
6 with the public.

7 Q Do you see about six lines down it says,  
8 "Representative - Internal Communications,

9 A. E. Arnold"?

10 A Yes.

11 Q What are internal communications as  
12 you understand it?

13 A I have never heard that term before.

14 Q Did you have any dealings with the  
15 Communications Division? Have you had any dealings  
16 with the Communications Division with respect to  
17 any of your job functions?

18 I am specifically referring to reviewing  
19 any publications or the mail that this Unit Superintendent  
20 would get.

21 A No. The Communications Division, to my  
22 knowledge, was not at all involved in information about  
23 events or occurrences at other plants.

24 MRS. VAUGHAN: Mr. Reporter, please mark  
25 this document.

(Copy of document entitled "Metropolitan Edison Company Corporate Division, Consumer Services - Corp." dated 4-1-79 marked B&W Exhibit No. 288 for identification as of this date.)

Q Do you see what has been marked as B&W Exhibit 288, "Metropolitan Edison Company Corporate Division, Consumer Services - Corp."?

A Yes.

Q Are you familiar with this division's functions?

A I was familiar with some of their functions during the time frame that this organization chart was published, 4-1-79.

Q What did they do?

A It was my understanding that Consumer Affairs, the people in Consumer Affairs generally dealt with customers and trying to establish new customers, resolving problems with existing customers, and those kinds of things.

Q Do you see down --

A And the people in the Communications Services Department were involved in public relations and employee newsletters.

Another function that they served which I interfaced with the division on was getting all the photography work done.

Q How about the Director of Public and Internal Information, is that the same kind of information you are referring to, public relations?

A I don't know. I have never heard that title before.

Q Do you know Mr. Seldomridge?

A No.

Q And Representative of Communications Services, Mr. Vollersten, have you heard that term before as used here?

A The name?

Q The Representative of Communications Services.

A I don't recall ever hearing the title.

Q Was he also involved in public relations kind of work?

A Yes.

Q During the course of this deposition we have referred to your files at various times.

Would you now describe, please, how you keep your files, what kinds of files you keep, whether

2 they are kept chronologically, how far back they go;  
3 just generally that kind of information.

4 A I keep -- I divide my files into three groups  
5 or three categories: Files of reports, and those  
6 files are filed by report type or title; and for the  
7 ones that I have issued, I have copies back to 1976  
8 usually.

9 A second category would be files by  
10 subject, which is the majority of the files that  
11 I keep.

12 And the third category would be files on  
13 things that -- on subjects that I am currently  
14 working on that I access frequently, and that is a  
15 very small number.

16 Q The files that you keep by subject, do  
17 they include the reports that you have done? In  
18 other words, would you double-file?

19 A No.

20 Q How far back do your subject matter  
21 files go?

22 A It depends on the specific files. Some files  
23 go back to when I started my employment.

24 Q Do you ever discard files?

25 A Yes.

2 Q Do you send files to Mr. Stowe for  
3 keeping after a period of time?

4 A I don't recall whether I did or not.

5 Q Do you send any files after a period of  
6 time to a central filing place?

7 A You say "Do you"?

8 Q Have you?

9 A I don't recall whether I have.

10 Q You don't recall?

11 A Whether I have or not.

12 Q You testified to having a file of  
13 Mr. Seelinger's notes from the date of the accident.

14 Have you got anyone else's files besides  
15 Mr. Seelinger's?

16 MR. MacDONALD: Not just relating to the  
17 day of the accident but just in general?

18 MRS. VAUGHAN: Right.

19 A No, I don't believe I do.

20 Q Have you ever been in a situation where  
21 you had to disseminate information about a transient  
22 or some kind of event quickly, immediately?

23 A Have I ever been?

24 Q Yes.

25 A Yes.

1

2 Q When was that?

3 A One time that I recall -- or I recall times  
4 when I was in the Navy.

5 Q At any time since you have been employed  
6 by Met Ed?

7 A How do you -- did you say "urgently"?

8 Q Quickly.

9 A That is kind of a relative term.

10 Q Immediately.

11 MR. MacDONALD: The next day?

12 MRS. VAUGHAN: Or even that day.

13 A Yes.

14 Q When was that?

15 A I don't recall any specific instances of that.

16 Q What do you recall then when you say  
17 "Yes"?

18 A I recall, for example, reading in RC bulletins  
19 or circulars in which I felt that it was important  
20 to relay information to the Superintendent within a  
21 day.

22 Q Have you been in a situation where you  
23 felt it was important to relay information to others  
24 besides the Superintendent? In other words, to get  
25 it around to the Engineers or Operators or whatever?



2 A It's been my general practice for something  
3 urgent that I prefer to have the Superintendent make  
4 the determination on how fast he wants it disseminated.

5 MRS. VAUGHAN: I don't have any further  
6 questions. Have you got any cross?

7 MR. MacDONALD: No.

8 (Time noted: 4:10 p.m.)

9

RONALD STEPHEN HARBIN

10

11 Subscribed and sworn to  
12 before me this day  
13 of , 1981.

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## I N D E X

WITNESS	PAGE
Ronald Stephen Harbin	485

## E X H I B I T S

B&W		FOR IDENT.
284	Memorandum dated September 14, 1979 from GPU	504
285	Copy of document entitled "GPU Service Corporation Information Division, Div. 50"	546
286	Copy of document entitled "GPU Service Corporation Administration Division, Div. 20"	547
287	Copy of document entitled "GPU Service Corporation Communications Division, Div. 80"	549
288	Copy of document entitled "Metropolitan Edison Company Corporate Division, Consumer Services - Corp." dated 4-1-79	551

\* \* \*

# METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject GPU INVESTIGATIVE TASK FORCE  
INTERVIEWS WEDNESDAY, SEPT. 19, and THURSDAY,  
SEPT. 20, 1979

Location TH-1 Nuclear Station  
Middletown, Pa. 17057

Date - 14 September 1979

To J. J. BLESSING  
R. R. BOOHER  
K. P. BRIAN  
C. C. FAUST  
E. R. FREDERICK  
K. R. HOYT  
G. A. KUNDER  
J. B. LOGAN  
B. G. SMITH  
F. J. SCHEIMANN  
W. H. ZEWE

Each of you have been notified previously concerning the subject interviews. The below schedule establishes specific times for each interview. Interviews will be held in the Security Processing Center, Superintendent's Conference Room.

## WEDNESDAY, SEPT. 19, 1979

8800 - 1100 <sup>Ken</sup> Zewe, Brian, Scheimann, Frederick, Faust - Group.  
1100 - 1200 <sup>Ken</sup> Faust - Alone  
1200 - 1330 Caucus/Lunch  
1330 - 1430 <sup>Ken</sup> Scheimann - Alone  
1430 - 1530 <sup>Ken</sup> Frederick - Alone  
1530 - 1000 <sup>Ken</sup> Logan - Alone

*Kunder  
Wheat  
William  
Tom  
Kotman  
Lung  
Ferguson  
Bryant 30%*

## THURSDAY, SEPT. 20, 1979

0700 - 1100 <sup>Brian</sup> Smith, Hoyt, Booher, Blessing - Group  
1100 - 1230 Caucus/Lunch  
1230 - 1500 <sup>Brian</sup> Kunder  
1500 - 1700 <sup>Brian</sup> [unclear]

Should you find it impossible to be present at the scheduled time, please inform me at your earliest convenience.

*R. S. HARBIN*  
R. S. HARBIN  
Technical Analyst

RSH:amt

cc: R. W. Keaton  
G. P. Hiller  
J. L. Seelinger  
M. J. Ross  
J. J. Chwastyk

*Need to Interview: Ross  
BRC  
Dunbar  
L. P. Ross  
Training*

INTER-OFFICE MEMORANDUM

*B+W 284*  
Date Exh. For ID  
Date Exh. in EV *10-1-81*  
Robert Capuzelo RFR  
Doyle Reporting, Inc. *RC*

1317

1695

BY W 285  
 Bell Exh. For ID 10-1-81  
 PW Exh. in EV  
 Robert Capuzelo RPR  
 Doyle Reporting, Inc. PC

008311

CPU SERVICE CORPORATION  
 INFORMATION SERVICES DIVISION  
 Pgs. 30

	Div/	Exch	Int	Rel.		No.
						Emp.
Manager - Information Services	50A	3	Y	D. J. Neale		3
Secretary Sr.	50A	3	Y	C. F. Scheraga		
Consultant	50A	3	Y	C. A. Trickey		
Supervisor - Staff Services	50A	3	Y	J. W. Roberts		3
Associate - Information Services	50A	3	Y	P. L. Filbert		
Administrative Clerk - Intermediate	50A	3	Y	D. L. Grief		
Asst. Mgr. - Applications Dev.	50A	3	Y	V. F. Muchmore		2
Secretary Sr.	50A	3	Y	D. A. Kender		
Supervisor - Business Applications	50A	3	Y	V. L. Cowley		26
Stenographer	50A	3	Y	V. R. Spels		
Staff Member Sr. - Information Services	50A	3	Y	D. C. Ludwig		
Analyst Sr. - Information Services	50A	3	Y	A. W. Seichter		
Analyst - Information Services	50A	3	Y	J. A. Bruce		
Staff Member - Information Services	50L	3	Y	A. C. Imfeson		
	50L	3	Y	S. O. Myskowski		
	50L	3	Y	C. A. Seichter		
Analyst Sr. - Information Services	50L	3	Y	D. P. Luban		
	50L	3	Y	A. Majarian		
	50L	3	Y	R. E. Spotts		
	50L	3	Y	J. A. Erick		
	50L	3	Y	J. W. Hanson		
Associate - Information Services	50L	3	Y	M. A. Russell		
Staff Member Sr. - Information Services	50L	3	Y	V. W. McEwen		
Staff Member Sr. - Information Services	50L	3	Y	V. C. Jones		
Staff Member - Information Services	50L	3	Y	L. C. Riehl		
	50L	3	Y	T. R. Ruckelsh		
	50L	3	Y	M. T. Egan		
Analyst Sr. - Information Services	50L	3	Y	S. C. Berry		
	50L	3	Y	M. C. Gross		
	50L	3	Y	D. L. Meyer		
	50L	3	Y	J. W. Matuzak		
Associate - Information Services	50L	3	Y	L. W. O'Rourke		
	50L	3	Y	J. L. Terbert		
Analyst - Information Services	50L	3	Y	D. W. Coffin		
Supervisor-Consumer Affs. App. Devlpt.	50L	3	Y	V. W. Sander, Jr.		23
Stenographer	50L	3	Y	S. W. Neale		
Staff Member Sr. - Information Services	50L	3	Y	L. W. Staffer		
Staff Member - Information Services	50L	3	Y	S. J. Teller		
Analyst Sr. - Information Services	50L	3	Y	L. J. Wrightbill		
	50L	3	Y	J. W. Handerswice		
	50L	3	Y	R. L. Schreck		
Staff Member - Information Services	50L	3	Y	L. C. Wellman		
Analyst Sr. - Information Services	50L	3	Y	R. P. Poon		
Staff Member - Information Services	50L	3	Y	V. F. Whitford		
Staff Member - Information Services	50L	3	Y	R. L. Mack		
Associate - Information Services	50L	3	Y	N. E. Gafferty		
	50L	3	Y	J. R. Hoffman		
Analyst - Information Services	50L	3	Y	R. J. Mueller, Jr.		
	50L	3	Y	D. J. Melky		
	50L	3	Y	D. E. Miller		
Staff Member Sr. - Information Services	50L	3	Y	V. L. Cable		
Analyst Sr. - Information Serv.	50L	3	Y	J. D. Eriehart		
	50L	3	Y	J. D. Fitzgerald		
Analyst - Information Services	50L	3	Y	R. D. Bailey		
	50L	3	Y	V. L. Kendrick		
Associate - Information Services	50L	3	Y	J. F. Fritz III		
	50L	3	Y	V. W. Gushue		

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CPU SERVICE CORPORATION  
INFORMATION SERVICES DIVISION  
Div. 90

Pos./  
Funt Loc. Bldg.

No.  
Seq.

Supervisor - Planning & Forecasting App. Dev.	SDC	3	W	J. W. Ireland
Staff Member - Information Services	SDC	3	W	G. D. Gaudin
Coordinator - S/S Application Control	SDC	3	W	P. E. Gilbert
Analyst Sr. - Information Services	SDC	3	A	A. E. Shannon
Analyst - Information Services	SDC	3	W	V. L. Fisher
Analyst - Information Services	SDC	3	A	V. L. Wagner
Staff Member - Information Services	SDC	3	W	D. L. Auman
Staff Member - Information Services	SDC	3	W	G. J. Patel
Analyst - Information Services	SDC	3	W	S. W. Gehman
Administrative Clerk	SDC	3	W	E. E. Strick
Supervisor - Generation and TAD App.	SDT	3	W	J. W. Long
Administrative Clerk - Inv.	SDT	3	W	E. E. Strick
Staff Member Sr. - Information Services	SDT	3	W	E. J. Becker
Analyst Sr. - Information Services	SDT	3	W	T. W. Gern, Jr.
Analyst - Information Services	SDT	3	A	S. D. Small
Analyst - Information Services	SDT	3	W	P. E. Harrison
Staff Member - Information Services	SDT	3	W	J. E. Washington
Staff Member - Information Services	SDT	3	W	J. E. Hirsch, Jr.
Staff Member - Information Services	SDT	3	W	P. D. Colahan
Analyst - Information Services	SDT	3	A	W. D. Phillips
Analyst - Information Services	SDT	3	W	M. T. Shewton
Analyst - Information Services	SDT	3	W	A. W. Stalacher, Jr.
Staff Member Sr. - Information Services	SDT	3	W	E. L. Jones
Staff Member - Information Services	SDT	3	W	J. F. Soper
Analyst - Information Services	SDT	3	W	J. E. Oberly
Staff Member - Information Services	SDT	3	W	D. W. Lewis
Analyst Sr. - Information Services	SDT	3	A	W. F. Lundgren
Analyst - Information Services	SDT	3	W	J. E. Bakshes
Staff Member - Information Services	SDT	3	W	E. E. Rothman
Analyst Sr. - Information Services	SDT	3	W	A. E. Joy
Analyst - Information Services	SDT	3	W	T. E. Selig
Associate - Information Services	SDT	3	W	T. A. Takach
Staff Member - Information Services	SDT	3	W	E. W. Verbeke
Analyst Sr. - Information Services	SDT	3	W	J. E. Suther
Associate - Information Services	SDT	3	W	E. P. Khadra

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11/4/98 14:2

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CPC SERVICE CORPORATION  
INFORMATION SERVICES DIVISION  
Nov. 70

No.  
List

31

	Dist/	Pos.	Sex	Grade	
Supervisor - Technical Services	100	3	M	J. D. Mabry	
Supervisor - Engineering Application Develop.	100	3	M	S. W. Parker	
Standards	100	3	M	L. W. Schindler	
Information Services Assistant	100	3	M	M. Z. Bickel	
Analyst Sr.	100	3	M		
Staff Member Sr. - Information Services	100	3	M	A. C. Lillie	
Analyst Sr. - Information Services	100	3	M	L. J. Foster	
	100	3	M	J. B. Miller	
	100	3	M	T. Thaddeus	
Staff Member - Information Services	100	3	M	T. F. Tarnowski	
Associate - Information Services	100	3	M	R. J. Strawn	
Staff Member - Information Services	100	3	M	T. P. Crade	
Staff Member - Information Services	100	3	M	E. G. Lawrence	
Analyst Sr. - Information Services	100	3	M	C. E. Amlund	
	100	3	M	M. T. Tishie	
Staff Member - Information Services	100	3	M	J. C. Warner	
Associate - Information Services	100	3	M	T. Crater	
	100	3	M	D. W. Green	
Consultant - Information Services	100	3	M	J. A. Yoder	
Analyst Sr. - Information Services	100	3	M	E. A. Buffner	
Staff Member Sr. - Information Services	100	3	M	W. J. McCarthy	
Consultant - Information Services	100	3	M	C. T. Wall	
Secretary	100	3	M	T. A. Keller	
Staff Member Sr. - Information Services	100	3	M	R. A. Farnsworth	
	100	3	M	R. S. Furrer	
Analyst Sr. - Information Services	100	3	M	D. E. Dritz	
	100	3	M	W. F. Kestinger	
	100	3	M	G. F. Velds	
	100	3	M	E. D. Mule III	
Information Services Assistant	100	3	M	W. F. Bond	
Analyst - Information Services	100	3	M	T. J. Stallion	
Staff Member Sr. - Information Services	100	3	M	R. A. Selts	
Supv. - Education & Standards	100	3	M	L. B. Shattuck, Jr.	
Staff Member - Information Services	100	3	M	J. A. Wilson	
Analyst - Information Services	100	3	M	D. L. McDowell	
Coordinator - Data Processing Center	100	3	M	S. A. Laffler	
Supervisor-Data Base Adm.	100	3	M	C. Wiggins	
Staff Member Sr. - Information Services	100	3	M	E. T. Fisher	
Staff Member - Information Services	100	3	M	W. E. Schindler, Jr.	
Associate - Information Services	100	3	M	J. A. Steinbaker	
Staff Member Sr. - Information Services	100	3	M	E. C. Fidler	
Associate - Information Services	100	3	M	C. L. Jackson	
Analyst Sr. - Information Services	100	3	M	E. J. Miller	
Analyst - Information Services	100	3	M	J. A. Brown	
Staff Member Sr. - Information Services	100	3	M	L. W. Anderson	

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CPS SERVICE CORPORATION  
INFORMATION SERVICES DIVISION  
Div. 30

	Div/	Pos	Loc	Bldg.	No.
Assistant Mgr. - Computer Operations & Tech. Dev.					
Supervisor - Computer Operations	30C	3	R	E. S. Dwyer	37
Staff Member Sr. - Information Services	30C	3	R	D. M. Herzfeld	
	30C	3	R	W. W. Maurer	
Staff Member - Information Services	30C	3	R	D. W. Sauty	
	30C	3	R	J. P. Ross	
Shift Supervisor - Information Services	30C	3	R	L. M. Schlegel	
	30C	3	R	L. D. Stetzel	
	30C	3	R	J. L. Walker	
	30C	3	R	E. G. Fair	
	30C	3	R	D. K. Flowers	
Computer Network Analyst	30C	3	R	T. A. Fogarty	
	30C	3	R	A. J. Klenick, Jr.	
	30C	3	R	J. P. Laudman	
	30C	3	R	C. E. Ludvik	
Computer Network Associate	30C	3	R	T. A. Brown	
	30C	3	R	E. E. Phillips	
	30C	3	R	E. S. Staffy	
	30C	3	R	E. A. Kramer	
	30C	3	R	T. S. Parnes	
Data Center Operator	30C	3	R	G. L. Garber	
	30C	3	R	W. E. Lecher	
	30C	3	R	E. L. Ulrich	
	30C	3	R	V. A. Reist	
	30C	3	R	L. J. Pasholizer	
Data Center Trainee	30C	3	R	E. G. Kalland, Jr.	
	30C	3	R	E. T. Wall	
	30C	3	R	A. P. Strickland	
	30C	3	R	W. P. Wall	(PT)
Analyst Sr. - Information Services	30C	3	R	E. M. Elliott	
Research Operator Sr.	30C	3	R	A. M. Christ	
Keypunch Operator	30C	3	R	S. A. Phillips	
	30C	3	R	P. A. Reiffenrader	
Data Center Assistant	30C	3	R	D. L. Wall	
Supervisor-Remote Terminal	30C	3	R	G. W. Felt	
Terminal Operator	30C	3	R	D. E. Ryness	
Keypunch Operator Sr.	30C	3	R	D. A. Tostales	
Keypunch Operator	30C	3	R	M. L. Gowers	
Total					173

Includes: 1 Part Time (PT)

Code	Location	Ex. Emp.
1	New York	
2	Paragipany	4
	Interpace (I)	3
	Mt. Lakes (ML)	1
	Korte (K)	
	JCP&L (JC)	
	Albuquerque (A/KO)	
3	Reading	169
	CP&SC (R)	169
	Met-Ed (ME)	
4	Johnstown	
	Pensler (PE)	
	Conneough (C)	
	Howar City (HC)	
5	TNG	
6	Forked River (F/R)	
Total		173

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 Date Exh. For ID 10-1-81  
 PW: [illegible]  
 Robert Capuzelo Rn  
 Doyle Reporting, Inc. RC

008316

CPU SERVICE CORPORATION  
 ADMINISTRATION DIVISION  
 Biv. 30

	Div/	Post	Inc	Slde.	No. Exp.
Vice President	200	2	1	W. J. Smith	2
Executive Secretary	200	2	1	W. A. Gresham	
Manager Corporate Services	200	2	1	W. T. Tolan	49
Secretary	200	2	1	M. Miller	
Adm. Assistant - General Office	221	2	1	W. W. Wason	
Typed Librarian	221	2	1	W. F. Savers	
Librarian	221	2	1	J. A. Toppa	
Administrative Clerk - Inv.	221	2	1	D. L. Barr	
Administrative - Personnel	221	2	1	W. T. Walker	
Receptionist	221	2	1	P. E. Chisum	
Switchboard Operator	221	2	1	W. E. Lowery	
Receptionist/Switchboard Operator	221	2	1	L. A. Algren	
Supervisor-Mail Services	221	2	1	E. C. M. Smith	
Administrative Clerk Jr.	221	2	1	V. A. Belluocic, Jr.	
Clerk - Mail	221	2	1	C. A. McCleave	
	221	2	1	A. A. Elliott	
	221	2	1	A. L. Mendicino	
	221	2	1	D. W. Foley	
	221	2	1	D. W. Jones	
	221	2	1	L. M. Williams	
Coordinator-Mail Services	221	2	1	C. J. Torres	
Administrative-General Office	221	2	1	B. D. Mulliken	
Building Control Monitor Chief	221	2	1	C. W. White	
Building Control Monitor (3)	221	2	1	D. A. Walsh	
	221	2	1	E. C. Elms	
	221	2	1	W. J. Thomas	
Supt.-Building Services-Paralegals	221	2	1	J. C. Kessen	
Supt. - Building Services - Reading	221	2	1	P. F. Vukobrat, Jr.	
Administrative - Building Services	221	2	1	P. G. Bell	
Administrative Clerk	221	2	1	B. W. Golden	
Photographic Operator	221	2	1	B. E. Partner	
General Maintenance Man	221	2	1	J. W. Andrew	
General Repair	221	2	1	T. F. J. Smith	
Janitor	221	2	1	W. F. J. Smith	
Clerk-Mail	221	2	1	C. F. Gashler, Jr.	(PT)
Mail Courier	221	2	1	P. J. Tork	
Receptionist/Switchboard Operator	221	2	1	C. S. Dennis	
	221	2	1	C. T. Dunkelberger	
Building Control Monitor Chief	221	2	1	S. F. Grove	
Building Control Monitor	221	2	1	M. A. Stoklus	(PT)
	221	2	1	J. L. Kockertel	(PT)
	221	2	1	T. S. Gracov	
	221	2	1	J. E. Ringman	
	221	2	1	E. E. Goul	
	221	2	1	C. L. Grove	
	221	2	1	W. F. Kessen	
Safety & Health Manager	200	2	1	W. C. Mitchell	
Administrative Clerk	200	2	1	T. T. Sullivan	
Industrial Hygienist	200	2	1	R. L. Wilson	
Security Manager	200	2	1	W. A. Rice	
Analyst - Security	200	2	1	E. C. Edmund	

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GPU SERVICE CORPORATION  
ADMINISTRATION DIVISION  
Div. 25

	Dir/	Emp.	Act.	Slde.	
Director - Human Resources	22A	2	W		V. C. Waters
Secretary Sp.	22A	2	W		G. S. Fletcher
Manager - Compensation & Benefits	22W	2	W		W. M. Palmer
Analyst I - Compensation & Benefits	22P	2	W		D. W. Hollenbach
Analyst II - Compensation & Benefits	22P	2	W		V. Morgan
Analyst III - Compensation & Benefits	22P	2	W		D. J. Fick
Administrative Clerk Sp.	22P	2	W		J. B. Franceline
Administrative Clerk Int.	22P	2	W		D. M. Parsons
Administrative Clerk	22P	2	W		S. R. Wolf
Manager - Personnel	22W	2	W		P. A. Leonscher
Secretary	22P	2	W		P. Gomez
Analyst - Employee Benefits	22P	2	W		D. D. Dorn
Area Personnel Manager	22P	2	W		J. E. Greene
Analyst - Personnel Selection	22P	2	W		J. T. Threlkeld
Stenographer	22P	2	W		S. Gundersen
Personnel Assistant	22P	2	W		D. J. Phelan
Stenographer	22P	2	W		S. R. Brown
Stenographer	22P	2	W		P. W. Morrell
Labor Relations Analyst	22W				
Manager - Training & Development	22W	3	W		L. E. Renner
Secretary	22P	2	W		S. E. Taitchick
Manager - Insurance and Claims	22W	2	W		W. F. Carate
Administrative Clerk Sp.	22P	2	W		P. L. Grier
Administrative Clerk	22P	2	W		W. W. Norsey
Total					74

No.  
Emp.

20

3

Excludes: 3 Part-time (PT)

Code	Location	No. Emp.
1	New York	
2	Pennsylvania	46
	Interpace (I)	4
	Mt. Lake (ML)	8
	Barto (B)	34
	JCPAL (JC)	
	Albuquerque (A/MO)	
3	Reading	28
	GPUSC (R)	28
	Mt-Ed (ME)	
4	Johnstown	
	Pennelco (PE)	
	Conemaugh (C)	
	Rosier City (RC)	
5	TYL	
6	Torhead River (T/R)	
Total		74

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 Def. Exh. For ID 10-1-81  
 PH. Exh. in EV  
 Robert Capuzelo RPR  
 Doyle Reporting, Inc. RC

008318

GPO SERVICE CORPORATION  
 COMMUNICATIONS DIVISION  
 DIV. 80

	Div/	Pos.	Loc.	Grade	Name
Vice President	EO1	2	T		W. B. Murray
Executive Secretary	(1)	EO1	2	T	J. M. Parry
Manager - Communications	EO1	2	T		E. W. Estess
Secretary	EO1				
Investor Publications Manager	EO1	2	T		J. A. Dunn
Representative - Internal Communications	EO1	2	T		A. E. Arnold
Administrative Clerk Int.	EO1	2	I		J. R. Pasquillo
Manager - Public Affairs	EO1	2	T		W. C. McKee
Manager - Consumer Affairs	EO1	4	PT		J. E. Baxter
Manager - Consumer Affairs	EO2	2	W		E. W. Smith
Secretary Sr.	EO2	2	W		C. E. Bennett
Director - Consumer Services	EO2	2	W		W. A. Vagstad
Director - Tech. Serv. Load Mgmt.	EO2	2	W		C. A. Brown
Director - Consumer Services Training	EO2	2	W		J. P. Parker
Analyst II - Economics	EO2	2	W		D. M. Egan

No.  
 Emp.

14

Total 14

(1) Also Secretary for Manager - Public Affairs

Code	Location	No. Emp.
1	New York	
2	Paragony	13
	Interpace (I)	7
	MT. Lakes (ML)	
	Barth (B)	6
	JCPAL (JC)	
	Albuquerque (A/WO)	
3	Reading	
	CPSC (R)	
	Met-Ed (ME)	
4	Industries	1
	Paralel (PL)	
	Commonwealth (C)	
	Home City (HC)	
5	DNI	
6	Yorked River (Y/R)	
	Total	14

11/4/80

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~~Robert Connors~~  
Doyle Reporting, Inc.

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TOTAL	45
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