

December 1, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

DEC -2 A8:41

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Docket No. 50-289 SP
(Management)

NOTICE TO THE COMMISSION,
APPEAL BOARD, LICENSING
BOARD AND PARTIES

In accordance with our practice of advising of changed circumstances, we enclose the following information for the Commission, Appeal Board, Licensing Board and parties.

On November 28, 1983, Mr. William G. Kuhns, Chairman, General Public Utilities Corporation, made a presentation to the Commissioners on the TMI-1 restart issues. The essence of the presentation is described in an enclosed news release, which announces changes in senior management personnel and the addition of outside directors to the GPU Nuclear Board who will have their own staff and who will comprise a Nuclear Safety and Compliance Committee. The announced changes in senior management are that Mr. Arnold has resigned as GPU Nuclear President, Mr. Clark who was Executive Vice President has been elected President and Mr. Kintner, formerly Vice President Administration, has

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been elected to fill Mr. Clark's prior position. Mr. Clark's qualifications were addressed before the Licensing Board; a copy of Mr. Kintner's resume is enclosed.

Mr. Kuhns presentation to the Commissioners also covered other personnel shifts. By letter dated July 18, 1983 to the Commission, we provided information on personnel reassignments made pursuant to Mr. Dieckamp's letter of June 10, 1983, to Chairman Palladino. Enclosed is a letter from Mr. Clark to Mr. Denton, Director, NRR, dated November 28, 1983, which forwards updated information on those personnel reassignments.

Respectfully submitted,

Ernest L. Blake, Jr.
Ernest L. Blake, Jr., P.C.
Counsel for Licensee

Enclosures

cc: Attached Service List

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Commission

In the Matter of)
METROPOLITAN EDISON COMPANY) Docket No. 50-289
(Three Mile Island Nuclear)
Station, Unit No. 1))

SERVICE LIST

Nunzio J. Palladino, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Victor Gilinsky, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Thomas M. Roberts, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

James K. Asselstine, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Frederick Bernthal, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Gary J. Edles, Chairman
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
John H. Buck
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Christine N. Kohl
Atomic Safety & Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Ivan W. Smith, Chairman
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Sheldon J. Wolfe
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Gustave A. Linenberger, Jr.
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Gary L. Milhollin
Atomic Safety & Licensing Board
1815 Jefferson Street
Madison, Wisconsin 53711

Docketing and Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Jack R. Goldberg, Esq. (4)
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Douglas R. Blazey, Esq.
Chief Counsel
Department of Environmental
Resources
514 Executive House
P.O. Box 2357
Harrisburg, PA 17120

John A. Levin, Esq.
Assistant Counsel
Pennsylvania Public Utility
Commission
P.O. Box 3265
Harrisburg, PA 17120

Mr. Henry D. Hukill
Vice President
GPU Nuclear Corporation
P.O. Box 480
Middletown, PA 17057

Mr. and Mrs. Norman Aamodt
R.D. 5
Coatesville, PA 19320

Ms. Louise Bradford
TMI ALERT
1011 Green Street
Harrisburg, PA 17102

Joanne Doroshow, Esquire
The Christic Institute
1324 North Capitol Street
Washington, D.C. 20002

Ms. Gail Phelps
ANGRY/TMI PIRC
1037 MacLay Street
Harrisburg, PA 17103

Ellyn R. Weiss, Esq.
Harmon & Weiss
1725 Eye Street, N.W., Suite 506
Washington, D.C. 20006

Michael F. McBride, Esq.
LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Suite 1100
Washington, D.C. 20036

Michael W. Maupin, Esq.
Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, VA 23212

David E. Cole, Esq.
Smith & Smith, P.C.
2931 Front Street
Harrisburg, PA 17110

News Release

General Public Utilities
Corporation
100 Interpace Parkway
Parsippany, New Jersey 07054
201 263-6500



Further information Gary D. Plummer
(201) 263-6779

For release November 28, 1983
10:00 a.m.

Date November 28, 1983

GPU PRESENTS "ALTERNATIVE APPROACH" TO RESOLVE TMI-1 RESTART ISSUES

PARSIPPANY, NJ, November 28 -- In a public meeting before the Nuclear Regulatory Commission (NRC) today the Chairman of General Public Utilities Corporation (GPU, William G. Kuhns, presented plans to add an outside independent Nuclear Safety and Compliance Committee drawn from an augmented board of directors of its nuclear subsidiary.

The GPU plans were presented in response to the Commission's Notice of October 7 saying that it was "prepared to consider alternative approaches" to resolution of open issues concerning management competence and integrity which could postpone the timetable for an NRC decision on the restart of GPU's Three Mile Island Unit 1 (TMI-1) until mid-1984 at the earliest, and possibly mid-1985 or later.

According to Mr. Kuhns, steps are underway to add three outside directors to the GPU Nuclear Corporation Board of Directors. At present that board is comprised of officers from throughout the GPU System companies.

- MORE -

GPU PRESENTS
"ALTERNATIVE
APPROACH" TO RESOLVE
TMI-1 RESTART ISSUES

"We are in the process of identifying qualified candidates with meaningful credentials and demonstrated independence for these important posts. It is our intent that following their election, the new outside directors would also serve the Board as the members of a Nuclear Safety and Compliance Committee," said the GPU chairman, adding that, "the Committee will be funded by the GPU operating company owners to employ a qualified staff, selected and supervised by the Committee, to monitor the operation and maintenance of the GPU System nuclear units. It is expected that this staff will also provide to the Committee an independent and integrated evaluation of their own in-plant observations, NRC inspections, industry evaluations and any other pertinent information."

Mr. Kuhns also announced today that Mr. R.C. Arnold, president and a director of the GPU Nuclear Corporation, has submitted his resignation from those positions. In Mr. Arnold's resignation, he pointed out that "...Because of the visible and central role I have had in TMI activities over the last four and one-half years, it seems certain that acceptance of GPU's position that TMI-1 will be operated by a new organization with different management than that which was in place at the time of the accident is improved if I step aside."

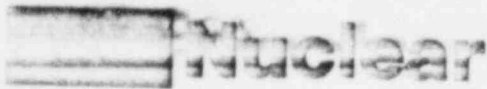
- MORE -

GPU PRESENTS
"ALTERNATIVE
APPROACH" TO RESOLVE
TMI-1 RESTART ISSUES

Mr. Kuhns said that Mr. Arnold's resignation has been regretfully accepted, and that Mr. Philip Clark, currently GPUNC Executive Vice President, has been named to succeed Mr. Arnold as president of that organization. Mr. Edwin Kintner, now GPUNC vice president, will replace Mr. Clark as Executive Vice President.

The steps outlined by GPU today follow those taken last summer to provide confidence that any inappropriate attitudes or practices of the past would not be carried forward. At that time, GPU senior management told the NRC that steps were being taken to assure that, until the open issues associated with TMI-1 restart are resolved, no personnel involved in current safety overview functions would have pre-accident involvement as either TMI or Met-Ed employees, and that the TMI-1 licensed operators would not include any who were assigned as TMI-2 licensed operators. Steps were also taken at that time to staff a new function to perform round-the-clock quality assurance review of operations.

"We are hopeful that the combination of the management changes announced today, and those implemented last summer, will provide the Commission with the basis to proceed on the TMI-1 restart decision while the remaining open issues are investigated and resolved," Kuhns stated.



GPU Nuclear Corporation
100 Interpace Parkway
Parsippany, New Jersey 07054
201 263-6500
TELEX 136-482
Writer's Direct Dial Number

November 28, 1983

Office of Nuclear Reactor Regulation
Attn: Harold R. Denton, Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Sir:

Three Mile Island Nuclear Station,
Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Status of Personnel Shifts

In his presentation to the Commission today, Mr. Kuhns stated that we would provide to the Staff detailed back-up information on the present status of the actions described in Mr. Dieckamp's letter of June 10, 1983. Enclosed is the information referred to. We have provided both a status as of November 18, 1983 and an annotated status showing changes from our plan as described on June 27, 1983 through November 18, 1983. I have also enclosed copies of Mr. Dieckamp's letters of June 10, 1983 to Chairman Palladino and Governor Thornburg.

I or my staff will be pleased to meet with you or others to explain or discuss the information provided.

Sincerely,

Philip R. Clark
Philip R. Clark,
President, GPU Nuclear Corp.

Attachments (2)

cc: D.G. Eisenhut
J.F. Stolz
G.C. Lainas

bcc: C.W. Smyth (w/ attachments)

GPU NUCLEAR PRESENTATION

RE: H. DIECKAMP LETTER OF JUNE 10, 1983

STATUS AS OF NOVEMBER 18, 1983

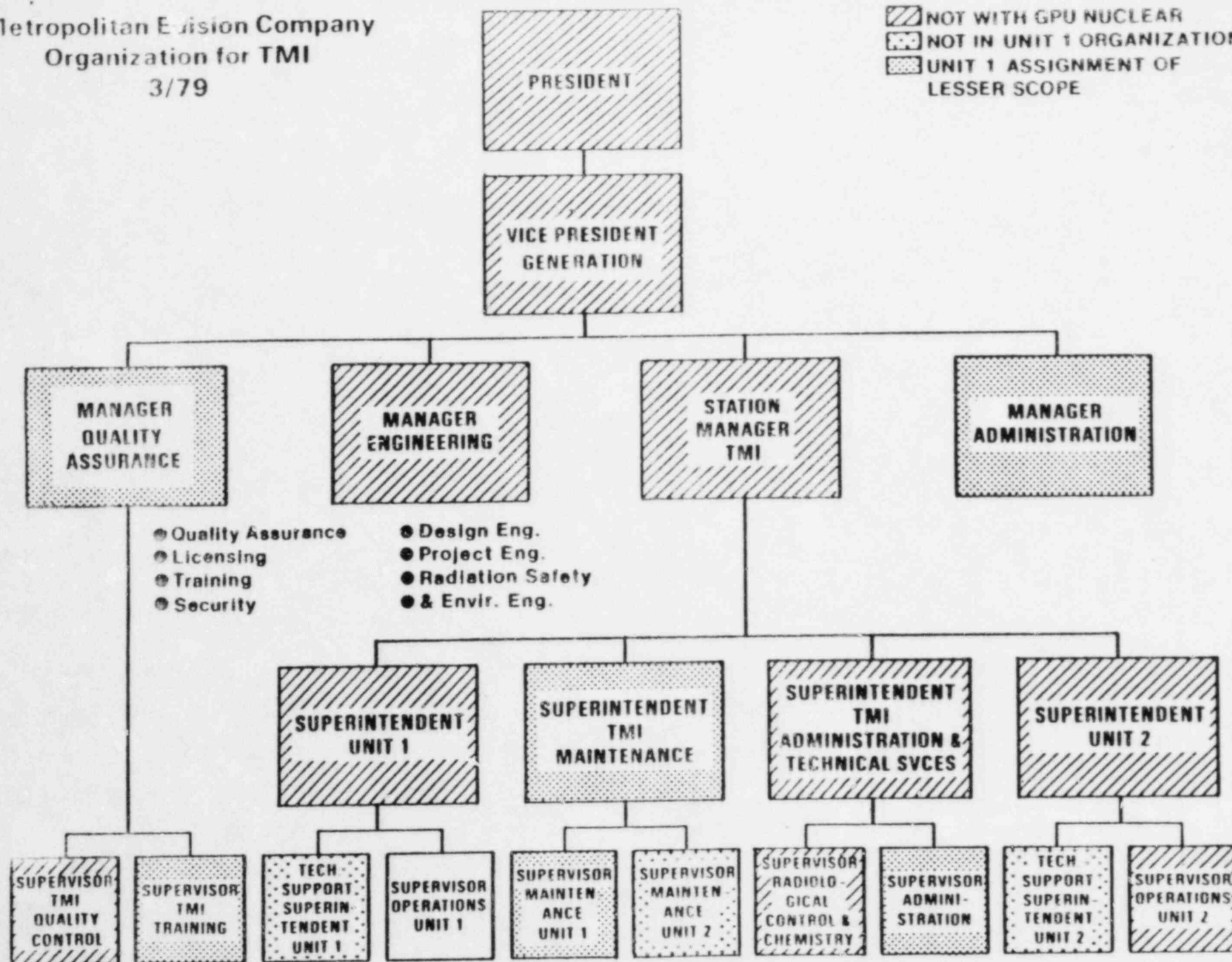
"AS A PRELIMINARY MATTER, IT IS USEFUL TO REVIEW THE METED ORGANIZATION THAT WAS RESPONSIBLE FOR OPERATION OF THE TMI STATION AT THE TIME OF THE ACCIDENT. NO MEMBER OF METED'S/TMI SENIOR MANAGEMENT IS NOW INVOLVED WITH TMI. FOUR LEVELS OF MANAGEMENT, THE METED PRESIDENT, VICE-PRESIDENT, STATION MANAGER, AND BOTH UNIT MANAGERS RESPONSIBLE FOR TMI AT THE TIME OF THE ACCIDENT ARE NOT WITH GPU NUCLEAR."

11. DIECKAMP LETTER DATED 6/10/83

11/18/83

Metropolitan Edison Company
 Organization for TMI
 3/79

[Diagonal lines] NOT WITH GPU NUCLEAR
 [Dotted pattern] NOT IN UNIT 1 ORGANIZATION
 [Cross-hatch pattern] UNIT 1 ASSIGNMENT OF LESSER SCOPE



11/18/83

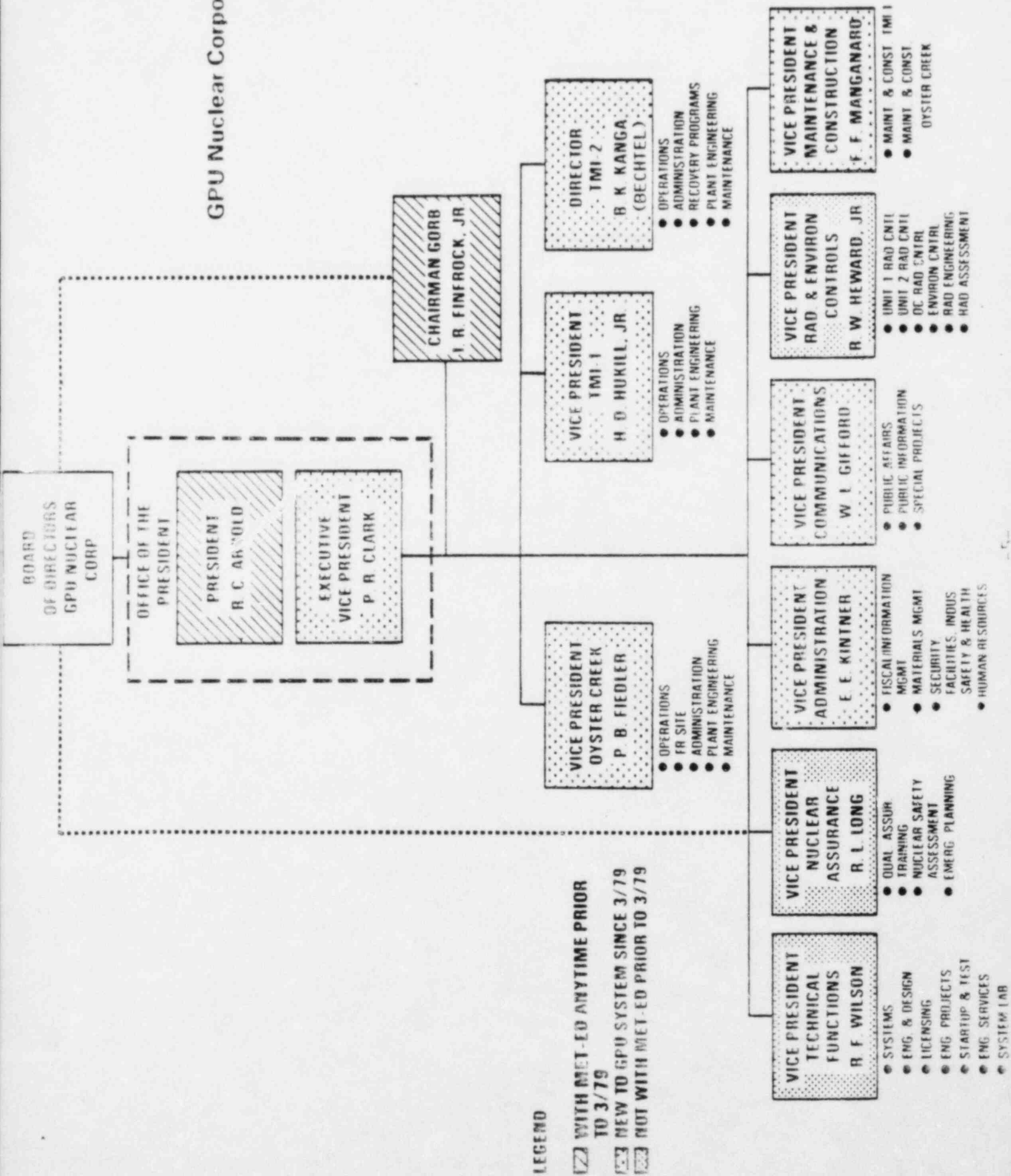
"THE SENIOR MANAGEMENT RESPONSIBLE FOR OPERATION OF TMI-1 TODAY IS DRAMATICALLY DIFFERENT THAN THAT WHICH EXISTED AT THE TIME OF THE ACCIDENT.

IN STRUCTURING GPU NUCLEAR WE HAVE PROVIDED DEDICATED ON SITE PERSONNEL FOR EACH OF THE GENERATING STATIONS WITH A HIGHLY EXPERIENCED SENIOR MANAGER ON SITE. WE HAVE PROVIDED EXPERIENCED MANAGERS AND STAFF FOR A NUMBER OF CENTRALIZED SUPPORT FUNCTIONS SUCH AS ENGINEERING, HEALTH PHYSICS, QUALITY ASSURANCE, TRAINING, MAINTENANCE, AND CONSTRUCTION IN ORDER TO EFFECTIVELY SUPPORT THE STATION MANAGEMENT."

H. DIECKMANN LETTER DATED 6/10/83

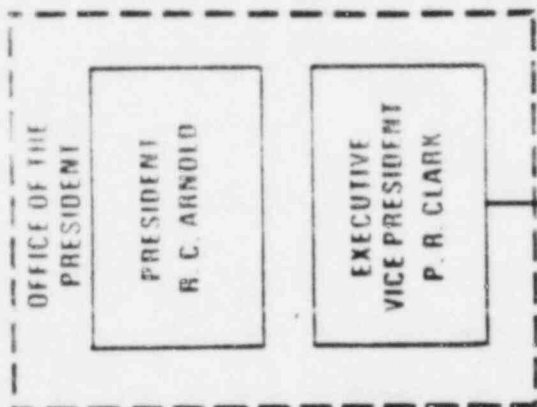
11/18/83

GPU Nuclear Corporation



GPU Nuclear Corporation

STATUS AS OF 6/83



LEGEND

A APPROXIMATE TOTAL EMPLOYEES APPLIED TO TMI-1

B KEY PERSONNEL INCLUDING MANAGERS, TECHNICAL/ PROFESSIONAL AND LICENSED OPERATORS

C NUMBER OF THOSE IN "B" NEW TO SYSTEM (POST 3/79)

D NUMBER OF THOSE IN "B" NOT WITH MET-ED (PRIOR TO 3/79)

TOTAL

922

442

233

100

CHAIRMAN GORB
I. R. FINFROCK, JR.

VICE PRESIDENT
TMI-1
H. D. HU ILL, JR.

A-325
B- 95
C- 30
D- 3

VICE PRESIDENT
TECHNICAL
FUNCTIONS
R. F. WILSON

A-155
B-105
C- 40
D- 45

VICE PRESIDENT
NUCLEAR
ASSURANCE
R. L. LONG

A-130
B-100
C- 80
D- 15

VICE PRESIDENT
ADMINISTRATION
E. E. KINTNER

A-195
B- 55
C- 24
D- 20

VICE PRESIDENT
COMMUNICATIONS
W. L. GIFFORD

A-15
B-10
C- 3
D- 2

VICE PRESIDENT
RAD & ENVIRON
CONTROLS
R. W. HEWARD, JR.

A-70
B-60
C-45
D-10

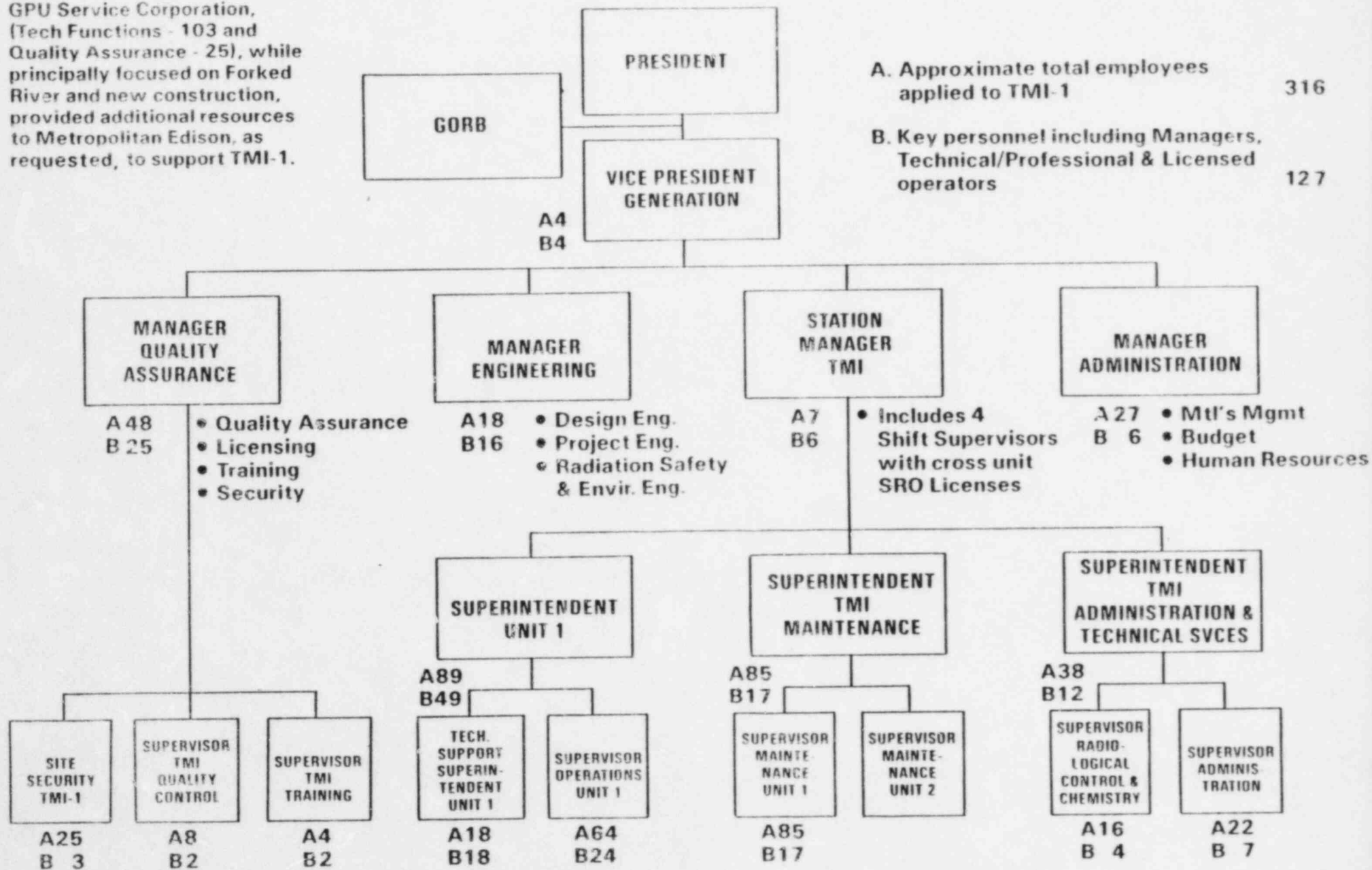
VICE PRESIDENT
MAINTENANCE &
CONSTRUCTION
F. F. MANGANARO

A-30
B-15
C-10
D- 5

Estimated Resources Applied to TMI-1 as of 3/79

Metropolitan Edison Company Organization for TMI-1

GPU Service Corporation, (Tech Functions - 103 and Quality Assurance - 25), while principally focused on Forked River and new construction, provided additional resources to Metropolitan Edison, as requested, to support TMI-1.



"A BROAD LOOK AT THE ELEMENTS OF GPU NUCLEAR WHICH WILL BE INVOLVED IN THE OPERATION OF TMI-1 REVEALS THAT THE ORGANIZATION, DOWN THROUGH TWO LEVELS OF MANAGEMENT BELOW THE GPU NUCLEAR VICE PRESIDENTS, ENCOMPASSING 86 SUCH POSITIONS, CONTAINS 16 INDIVIDUALS THAT WERE WITH METED PRIOR TO THE ACCIDENT. OF THE BALANCE, 30 ARE NEW EMPLOYEES SINCE THE ACCIDENT AND THE REMAINING 40 COME FROM OTHER COMPONENTS OF THE GPU SYSTEM. THE EXECUTIVE V.P. OF GPU NUCLEAR AND THE VICE PRESIDENT DIRECTLY RESPONSIBLE FOR TMI-1 SITE OPERATIONS ARE NEW."

(86 positions has increased to 88, and 16 individuals has increased to 18.)

H. DIECKAMP LETTER DATED 6/10/83

11/18/83

GPU NUCLEAR CORPORATION

COMPOSITION AND PRIOR HISTORY OF MANAGEMENT INVOLVED IN TMI-1 ACTIVITIES
(EXCEPT STRICTLY ADMINISTRATIVE FUNCTIONS) DOWN THROUGH TWO LEVELS BELOW DIVISION V.P.

<u>Office of President</u>	(3)	Employee of MetEd <u>Prior to March 1979</u>	<u>Comment</u>
President		Yes <u>9/63 to 5/77</u>	<ul style="list-style-type: none"> . Development & performance of GPUN Organization 3/79 to date . NRC SALP . INPO . Special NRC Inspection . Safety Overview & Checks designed into organization including: GORB, Dir. Nuclear Assurance & Quality Assurance Dir. with direct access to Board of Directors . Shares Office/President with Exec. V.P. who also sits on Board of Dir.
Executive V.P.		No	<ul style="list-style-type: none"> . "...TMI-1 will report to the Executive Vice President and such that he will be able to devote his prime attention to TMI-1 matters."
Chairman - Gen. Office Review Boards (GORB)		Yes 6/52 to 5/71	<ul style="list-style-type: none"> . Assignments: Non-Nuclear 6/52-3/61 Saxton 3/61 - 4/70 Oyster Creek 5/70 - 7/81
<u>Division</u>			
<u>Technical Functions</u>	(31)	None except: TMI-1 Start-up and Test Mgr.	<ul style="list-style-type: none"> . Indirect role in plant safety. . Others set acceptance criteria. . Signoff by Plant. . Subject to Quality Assurance Plan, etc.
Technical & regulatory adequacy of all activities			
<u>Nuclear Assurance</u>	(16)	None	
Quality Assurance Nuclear Safety Assessment Emergency Preparedness Training			
<u>Maintenance & Construction</u>	(10)	None except: Mgr - M&C Planning TMI-1 Mgr. M&C Tech. Support TMI-1	<ul style="list-style-type: none"> . Indirect impact on safety - . Does not set requirements for work or verify completion . Quality Assurance Plan & other overviews apply to M&C work
Establish policies, practices & procedures for Maintenance & Construction - carry out major maintenance & modifications			

Employee of MetEd
Prior to March 1979

Comment:

Division (continued)

. Radiological & Environmental (10)
Controls Division

One
Radiological
Training Mgr.

Establish and implement
Radiological & Environmental
policies, practices and pro-
cedures and carry out monitor-
ing and surveillance programs.

- . Indirect role in plant safety-
- . Establishment & Enforcement
of Nuclear Management
Direction & Policies
- . Performance as evaluated by
ASLB, SALP, INPO, Special
NRC Inspection
- . Organizational Design provides
multiple overviews & checks

TMI-1 Division (18)

Operate and maintain TMI-1
safely, consistent with
corporate requirements, and
in compliance with laws,
regulatory requirements and
technical requirements.

V.P.

No

Operations & Maintenance Director

No

Mgr. Plant Operation

Yes

Mgr. Plant Chemistry

Yes

Mgr. Plant Maintenance

Yes

Admin & Technical Support

Yes

Coord. Maint./Ops.

Yes

- . Establishment & Enforcement
of Nuclear Management
Direction & Policies
- . Performance as evaluated by
ASLB, SALP, INPO, Special
NRC Inspection
- . Organizational Design provides
multiple overviews & Checks

Employee of MetEd
Prior to March 1979

Comment

Division (continued)

. TMI-1 Division (continued)

Plant Engineering Director	Yes	{ Establishment & Enforcement of Nuclear Management Direction & Policies Performance evaluated by ASLB, SALP, INPO, Special NRC Inspection Technical Functions role including Design Control & Review of Operating and Emergency Procedures
Lead Mechanical Engr	Yes	
Lead Nuclear Engr.	Yes	
Lead I&C Engr.	Yes	
Lead Electrical Engr.	Yes	
Fire Protection	Yes	
Special Project	Yes	
Chemistry	Yes	Overview, particularly IOSRG
Mgr. Plant Administration	Yes	Coordinating Indirect role
Mgr. Plans & Programs	No	

Total 88

"AT THE TIME OF RESTART WE EXPECT TO UTILIZE 38 CURRENTLY LICENSED OPERATORS FOR TMI-1; 25 ARE NEWLY LICENSED SINCE THE ACCIDENT. OUT OF THE REMAINING 13 THAT WERE LICENSED AT THE TIME OF THE ACCIDENT, 10 ARE ASSIGNED TO SHIFT ACTIVITIES. THESE OPERATORS NEED TO BE VIEWED AS A SOURCE OF EXPERIENCE FOR THE SAFE OPERATION OF TMI-1. THEIR PROSPECTIVE PERFORMANCE MUST ALSO BE ASSESSED IN LIGHT OF (1) THE FACT THAT ALL HAVE BEEN LICENSED UNDER THE NEW TESTING CRITERIA, (2) THE ABILITY OF GPUN TO PROVIDE 6 SHIFT COVERAGE FOR TMI-1 WHICH PROVIDES ONE SHIFT OUT OF SIX FOR TRAINING, (3) THE PRESENCE OF SHIFT TECHNICAL ADVISORS, AND (4) SIGNIFICANTLY IMPROVED PROCEDURES.

AS FURTHER ASSURANCE:

- 1) WE WILL, PRIOR TO RESTART, REASSIGN PERSONNEL SUCH THAT NO TMI-2 LICENSED OPERATOR WILL OPERATE TMI-1 (EXCEPT FOR THE MANAGER OF OPERATIONS WHO WAS LICENSED ON UNIT 2 BUT WHO WAS EVALUATED IN DEPTH AND SPECIFICALLY ENDORSED BY THE ASLB)..."

H. DIECKAMP LETTER DATED 6/10/83

11/18/83

Current Holders of TMI-1 Licenses as of 11/18/83

SRO License

16

<u>Status</u>	<u>Title</u>	<u>Current License #</u>	<u>Comment</u>
Licensed on Unit 1 and 2 prior to 3/79	Mgr - Operations Ross (1)	SOP2053	<ul style="list-style-type: none"> . Heavily reviewed by ASLB including cheating proceedings . Performance as indicated in SLAP-Special Review . Rarely functioned on Unit 2 . Reexamined 1982 Cross Checks
Licensed prior to 3/79	Shift Supervisors Shift Supervisor Shift Supervisor Shift Supervisor Shift Supervisor Engr Sr II Supv. Simulator Inst. Shift Foreman (SRO granted 6/24/83 former RO OP4888)	SOP4113 SCP3235 SOP3273 SOP4263 SOP2783 SCP3393 SOP2784 SOP10032	<ul style="list-style-type: none"> . Relicensed under new procedures . ASLB Review of cheating . Special NRC Review . Cross Checks including Shift Technical surveillance (new) . Management Enforcement of Policy & Practice
	(8)		
Licensed subsequent to 3/79	Shift Foreman Shift Foreman Shift Foreman Shift Foreman Shift Foreman Shift Foreman Shift Tech Advisor	SOP4358 SOP4361 SOP4395 SOP4460 SOP4245 SOP3703 SOP4114	<ul style="list-style-type: none"> Promoted to Shift Supv. Reassigned, Shift Foreman.
	(7)		
Total SRO Licensees at Restart	<u>16</u>		

Current Holders of TML-1 Licenses (con't)

License

<u>Status</u>	<u>Title</u>	<u>License</u>	<u>Comment</u>
Licensed on Unit 1 prior to 3/79	Control Room Operator	OP5915	<ul style="list-style-type: none"> . Relicensed under new procedures . ALSB Review of cheating . Special NRC Review . Cross Checking including Shift Technical Surveillance (new) . Management Enforcement Policy & Practice
	Control Room Operator	OP3604	
	Control Room Operator	OP4647	
	Control Room Operator	OP4101	
	(4)		
Licensed sub- sequent to 3/79	Control Room Operator	OP6229*	*In training for SRO/Shift foreman.
	Control Room Operator	OP6293	
	Control Room Operator	OP6294*	
	Control Room Operator	OP6295	
	Control Room Operator	OP6296	
	Control Room Operator	OP5913	
	Control Room Operator	OP5751	
	Control Room Operator	OP6292	
	Control Room Operator	OP6230	
	Control Room Operator	OP6297	
	Control Room Operator	OP5909	
	Control Room Operator	OP5910	
	Admin Nuc Tech Trng	OP6030	
	Control Room Operator	OP6311	Granted 4/26/83
	Control Room Operator	OP6330*	Granted 5/4/83
	Non-Licensed Op Trng.	OP6329	Granted 5/4/83
	Control Room Operator	OP10043	Granted 6/24/83
	Control Room Operator	OP10045	Granted 6/24/83
	(18)		
Total current ROs to be licensed at restart	(22)		
Total Licensed at Restart	(38)		

- 2) "WE WILL, PRIOR TO RESTART, ADD FULL TIME ON SHIFT OPERATIONAL QUALITY ASSURANCE COVERAGE BY DEGREED ENGINEERS UNTIL THE OPEN ISSUES ARE RESOLVED. WE WOULD DEFER TO THE NRC SHOULD IT WISH TO PROVIDE FULL TIME ON SHIFT RESIDENT INSPECTOR COVERAGE OF TMI-1 OPERATIONS."

THIS IS IN ADDITION TO SHIFT TECHNICAL ADVISORS (STA).

H. DIECKAMP LETTER DATED 6/10/83

11/18/83

OQA SHIFT MONITORING ENGINEERS STAFF AS OF 11/1/83

<u>Shift Monitor</u>	<u>Degree/Year</u>	<u>Other related Experience</u>	<u>GPU Start Date</u>	<u>GPUN Experience</u>
1	BSME/1982	Gilbert Associates - Engineering co-op Stu- dent in Piping Engineer- ing Department	06/21/83	Engineer I working in Corrective Maintenance group at TMI
2	BS Biology/ 1978	Harrisburg and Lower Allen Township Water Treatment Facilities - Operations and Shift Supervision	01/20/82	Chemistry Technician-A working at TMI
3	BSEE/1980	None	09/08/80	Electrical Engineer I working in Technical Functions Division
4	BS Biology/ 1979	Hershey Foods Corp. - Analytical Chemistry Department Employee	09/21/81	Chemistry Technician-A working at TMI
5	BSCE/1982	B&W, Lynchburg - Engineer- ing Co-op Student in Systems Mechanical Analysis Dept.	07/12/82	Engineer I working in Maintenance at TMI
6	BS Biology/	Derry Township Advanced Waste Water Treatment Facility - Chief Opera- tor of Process Control	07/12/82	Tour Support Clerk at TMI; trained in plant systems as a plant tour guide

. All Shift Monitors satisfy the degree requirements specified in ANSI/ANS 3.1-1978, American National Standard for Selection and Training of Nuclear Power Personnel.

. OQA Shift Monitors were selected from a group of twelve candidates using the following basis:

- Degree and experience
- Interest in success of program
- Communication skills
- Diversity of background for team concept.

SUMMARY OF QA SHIFT ENGINEER
INDOCTRINATION AND TRAINING

1. Initial Training Prior to Going On-Shift:

- a) A series of lectures and/or required reading which covered selected subjects in the areas of Administration, Operations, Maintenance, Surveillance, Chemistry, Rad Con, Security, Quality Assurance and TMI Systems overview. This training was a very broad brush overview and was composed of approximately 40 hours of lectures and 20 hours of required reading.
- b) Performed plant tours to be familiar with the plant spaces, locations and major components supporting technical specifications and start up/shutdown activities.
- c) Required to demonstrate the ability to complete an established shift monitoring checklist.
- d) Was orally examined to have sufficient knowledge of the above topics to be capable of determining the compliance of activities observed to these requirements.

2. Continuing Training Program

Based on input from Plant Management, QA, and the Shift Monitors. Concentrated on areas of training that would enhance monitor's ability to verify compliance.

- a) During Operations or Major Plant Evolutions - receive an average of one week training every six weeks on the following:
 - . Operator Training (selected basis)
 - . Maintenance Technician Training (selected basis)
 - . Radiation Control Technician Training (selected basis)
 - . Chemistry Technician Training (selected basis)
 - . Quality Assurance Training
- b) On-the-Job Training under the direction of a certified Lead QA Monitor - two weeks out of every six weeks on a continuing basis.
- c) Accelerated Training Program - formal 3-4 week training program has been developed by the Training Department to improve monitors knowledge in:
 - . Plant Systems, Integrated Plant Operations, Maintenance Administration, Technical Specifications, TMI Procedural Structures and Administrative Controls, Radiological Release Requirements/Calculations, Plant Fundamentals, Chemistry Control, and Radiological Controls.
- d) Simulator Training - program scheduled for QA shift engineering monitors in 1984.

FUNCTIONAL ACTIVITY
GENERIC DESCRIPTION

OPERATIONS QA (OQA) SHIFT MONITORING ENGINEER

Personnel assigned as OQA Shift Monitoring Engineers shall be responsible to provide twenty-four hour shift coverage of operations activities conducted at TMI Unit 1. The individual will be trained in specific QA verification techniques orientated towards verifying that plant activities are being conducted in accordance with regulatory requirements and approved plant procedures and programs. Typical activities to be observed and verified will include items such as selected safeguard system valve lineups and surveillance tests, selected operator calculations for environmental releases and routine operations, selected Radiological Control practices, selected Security, Administrative and Fire Protection practices, selected Radwaste, Chemistry, Engineering and Maintenance practices.

OQA Shift Monitoring Engineers will be assigned to a shift rotation cycle that will overlap shift turnover activities and that will continually expose the individual to different shift supervision and practices. The individuals assigned will be accountable on a shift or other periodic basis to provide Operations QA and Plant Management with an assessment of the effectiveness and status of a shift activity compliance to activities selected for observation.

QA Shift Monitoring Engineers will receive administrative direction from OQA Operations/Radiological Controls Monitoring Supervisor. The individual will receive technical direction assignments on a shift or daily basis from the OQA Operations/Radiological Controls Monitoring Supervisor and the OQA Maintenance/Modification/Support Monitoring Supervisor.

OQA Shift Monitoring Engineers will interface with Unit shift supervision to keep them informed of problems discovered in shift activities they observe. OQA Monitoring Leads and Duty QA Monitors, QC Inspectors and QA Engineering personnel will be available to provide technical assistance and guidance to the OQA Shift Monitoring Engineers if needed for determining compliance of those activities observed with which specific training has not been provided to the OQA Shift Monitoring Engineer.

OQA Shift Monitoring Engineers will have the authority and responsibility to initiate QA Stop Work actions or initiate Unit shutdown recommendations in accordance with QA Department Project Procedures.

Reporting of observations made on a shift or daily basis will be made via a shift logging mechanism and the initiation of periodic OQA Monitoring Reports to OQA Supervision for review and distribution to Plant or other division management and supervision. This coupled with the interface with shift supervision will provide constant feedback to management on shift performance in meeting requirements.

"IN ORDER TO PROVIDE ADDED ASSURANCE:

WE WILL REASSIGN PERSONNEL SUCH THAT THOSE FUNCTIONS WHICH PROVIDE AN OVERVIEW ASSESSMENT, ANALYSIS, OR AUDIT OF PLANT ACTIVITIES SPECIFICALLY;

GENERAL OFFICE REVIEW BOARD

INDEPENDENT ON-SITE SAFETY GROUP

SHIFT TECHNICAL ADVISORS

Q/A AUDIT

Q/A AND Q/C SITE STAFF

LICENSING

RADIATION CONTROL

EMERGENCY PREPAREDNESS

WILL CONTAIN ONLY PERSONNEL WITH NO PRE-ACCIDENT INVOLVEMENT AS EXEMPT METED EMPLOYEES AT TMI-1 OR 2. WE WILL CONTINUE THIS CONSTRAINT UNTIL THE OPEN ISSUES ARE EFFECTIVELY RESOLVED."

H. DIECKAMP LETTER DATED 6/10/83

11/18/83

FUNCTIONS WHICH PROVIDE AN OVERVIEW ASSESSMENT, ANALYSIS, OR AUDIT OF PLANT ACTIVITIES

<u>General Office Review Board</u>	<u>Employee of MetEd Prior to March 1979</u>	<u>Comment</u>
<ul style="list-style-type: none"> — Consider potentially significant nuclear and radiation safety and related management matters — Reports to Office of the President, GPUN. Has direct access to Board of Directors, GPUN — 		
10 members - 5 GPUN, - 5 Outside	Chairman GORB	. Assignments: Non-Nuclear 6/52-2/61 Saxton 3/61 - 4/70 Oyster Creek 5/70 - 7/81

SEE PAGE 18A

Corporate Nuclear Safety Assessment Department (NSAD)

<ul style="list-style-type: none"> — Investigate assess & recommend... to assure overall safety. Reports to VP & Director, Nuclear Assurance Division. 	
Manager plus 3 professionals	None

Independent On-Site
Safety Review Group

<ul style="list-style-type: none"> — Full time - on-site Reports offsite to Manager, NSAD - 	
Manager + 4 professionals	None Two prior incumbents reassigned.

FUNCTIONS WHICH PROVIDE AN OVERVIEW ASSESSMENT, ANALYSIS, OR AUDIT OF PLANT ACTIVITIES

<u>Shift Technical Advisors</u>	<u>Employee of MetEd Prior to March 1979</u>	<u>Comment</u>
— Degreed engr. specifically qualified. On-Shift - Report to Technical Functions Division - not to Plant	3	None
		One prior incumbent reassigned, as planned. One resigned; Two still in training; Four additional in training as of 9/83. Anticipate qualification as follows: One - 12/83 One - 1/84 Four - 5/84
<u>Radiological Controls</u>		
— exempt personnel below management	13	None
<u>Emergency Preparedness</u>		
— exempt personnel below management	5	None
		One prior incumbent reassigned.
<u>Licensing</u>		
— exempt personnel below management	12	None

FUNCTIONS WHICH PROVIDE AN OVERVIEW ASSESSMENT, ANALYSIS, OR AUDIT OF PLANT ACTIVITIES

<u>Division</u>	Exempt MetEd Employee Assigned to TMI Site <u>3/77 to 3/79</u>	<u>Comment</u>
<u>Quality Assurance</u>		
QA Audit & Q/A Q/c TMI-1 Site Staff		
52	Ops QA Mgr	6/10/83 Incumbents have been reassigned and replaced as planned as of 9/1/83.
	Maint M&I Monitoring Supv	
	Ops Radcon Monitoring Supv	
	QC Inspector	
	QA Engineer	
	QC Project Engineer	
	QC NDE Welding Supv	
	Admin Trng Monitor	
	TMI Audit Supv	
	QA Monitor	

GPUN MANAGEMENT OR OVERSIGHT PERSONNEL WHO WERE MEMBERS OF THE PREDECESSOR TMI GORB PRIOR TO
TO 3/79

<u>PRESENT POSITION</u>	<u>DATE OF ASSIGNMENT TO PREDECESSOR TMI GORB</u>
. President	02/73*
. Chairman GORBs	09/71
. V.P. Radiological & Env. Controls & Member TMI-1 GORB	11/69
. Dir. Licensing & Regulatory Affairs & Member TMI-1 GORB	09/71
. Outside Member TMI-1 GORB	11/69

COMMENTS:

- . Open issues unlikely to involve these individuals solely because of their prior GORB membership. Any other sources of vulnerability, considered above.
- . Current TMI-1 GORB strengthened relative to 3/79
 - Structure and controls of GPUN provide better visibility of day to day performance and permit more effective review.
 - Previously two outside members; now a minimum of four required.
 - Greater emphasis on GORB role and functions reflecting lessons from TMI-2 accident.
 - Chairman's only other assignments are Chairman of TMI-2 and Oyster Creek GORB's
 - Formal direct access to Board of Directors.
 - Increased Staff Support.
 - Expanded use of subcommittees.

*Left GORB 3/77

11/18/83

"WE HAVE REALLOCATED THE PRIORITIES AND ASSIGNMENTS WITHIN THE OFFICE OF THE PRESIDENT OF GPU NUCLEAR, WHICH OFFICE INCLUDES THE PRESIDENT AND EXECUTIVE VICE PRESIDENT, SUCH THAT TMI-1 WILL REPORT TO THE EXECUTIVE VICE PRESIDENT AND SUCH THAT HE WILL BE ABLE TO DEVOTE HIS PRIME ATTENTION TO TMI-1 MATTERS."

H. DIECKAMP LETTER DATED 6/10/83

11/18/83

Inter-Office Memorandum

Date June 9, 1983

Subject Areas of Concentration for
the Office of the President

GTU Nuclear

To Vice President, TMI-1
Director, TMI-2
Vice President, Oyster Creek
Acting Director, Administration
Vice President, Communications
Vice President, Radiological & Environmental Controls
Vice President, Maintenance & Construction
Vice President, Technical Functions
Vice President, Nuclear Assurance
Chairman, GORBs

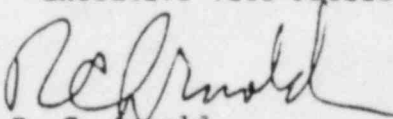
Location Headquarters/Parsippany

The Office of the President memorandum, same subject, dated January 22, 1982, described the then current areas of concentration for the Office of the President. This memorandum describes revised areas of concentration effective July 1, 1983. It supersedes prior guidance.

The officer listed below as "lead" for a particular activity is the normal direct reporting point within the Office of the President for the subject activity. Substantive written communications addressed to the officer with lead for a particular activity should be copied to the other O/P officer. As before, any item can be referred to, or addressed to, either the President or the Executive Vice President in cases where the other is unavailable on a schedule suitable for the matter in question.

<u>AREA</u>	<u>O/P LEAD</u>
TMI-2	President
TMI-1	Executive Vice President
Oyster Creek	President
Technical Functions	Executive Vice President (Vice President, Technical Functions will assist the Executive Vice President in keeping the President briefed on Oyster Creek and TMI-2 specific activities)
Communications	President

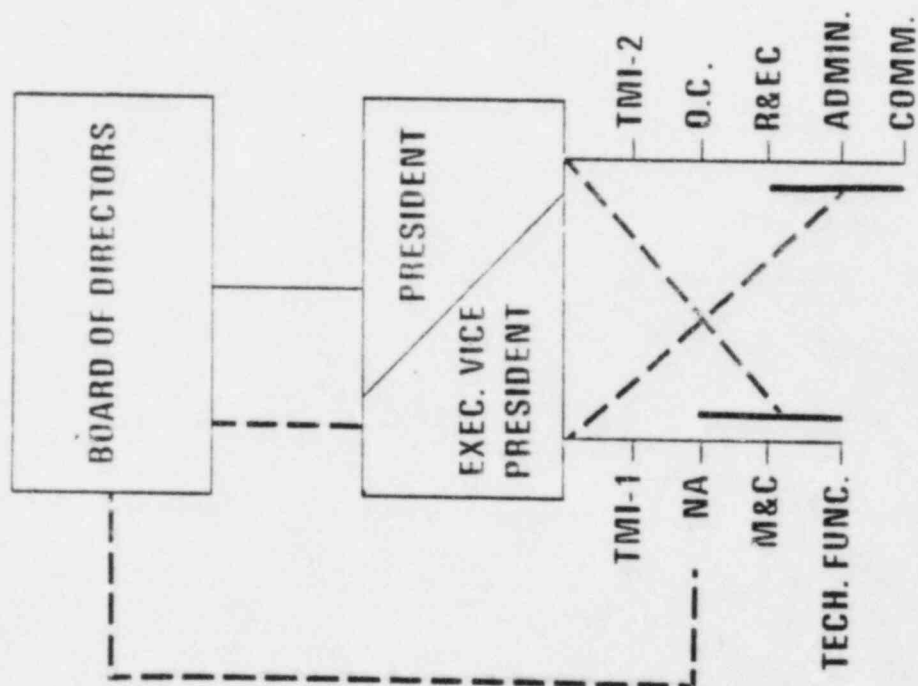
<u>AREA</u>	<u>O/P LEAD</u>
Radiological & Environmental Controls:	
• Plant Specific	President or Executive Vice President with lead for the Plant
• General/Headquarters	President
Administration	President
NOTE: Administration Division activities in support of specific Divisions should interface, as appropriate, with the officer having the lead role.	
Nuclear Assurance	Executive Vice President (Vice President, Nuclear Assurance will assist the Executive Vice President in keeping the President briefed on Oyster Creek and TMI-2 specific activities)
Maintenance & Construction	Executive Vice President (Vice President, Maintenance & Construction will assist the Executive Vice President in keeping the President briefed on Oyster Creek specific activities)
GORB	Same as Plant
Rate Case	President
External Matters (other than NRC)	President
NRC	
• Plant Specific	Same as for Plant involved
• General	Executive Vice President


R. C. Arnold
President

pk

cc: Executive Vice President
GPU Nuclear Board of Directors

AREAS OF CONCERN FOR
OFFICE OF PRESIDENT GUN



6/20/83

Herman Dieckamp
President



GENERAL
PUBLIC
UTILITIES
CORPORATION

100 Interpace Parkway
Parsippany, New Jersey 07054
201 263-6500
TELEX 136-482
Writer's Direct Dial Number

June 10, 1983

Docket No. 50-289

Chairman Nunzio J. Palladino
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Chairman Palladino:

Recently, the NRC staff stated, "because of all the open issues....the staff can draw no conclusion regarding management integrity at this time". Additionally, the Commonwealth of Pennsylvania's "Supplemental Comments" of June 2, 1983, stated that, "the Commonwealth will not support the restart of TMI-1 until it receives adequate assurances from the Commission that the management of GPU Nuclear Corporation is willing and able to operate the plant in a safe and competent manner".

We have again evaluated the present GPU Nuclear organization to reassure ourselves and to provide a basis for the confidence of others that any inappropriate attitudes or practices of the past have not been carried forward and will not manifest themselves in GPU Nuclear.

We retain confidence in the capability and integrity of the GPU Nuclear organization and personnel. The basis is further evidenced by the in-depth assessment conducted by the Licensing Board, as well as by independent measurements by industry's INPO, NRC's SALP and other inspections and by Licensee's own consultants.

As a preliminary matter, it is useful to review the MetEd organization that was responsible for operation of the TMI Station

at the time of the accident. No member of MetEd's/TMI senior management is now involved with TMI. Four levels of management, the MetEd president, vice-president, station manager, and both unit managers responsible for TMI at the time of the accident are not with GPU Nuclear. The senior management responsible for operation of TMI-1 today is dramatically different than that which existed at the time of the accident.

In structuring GPU Nuclear we have provided dedicated on site personnel for each of the generating stations with a highly experienced senior manager on site. We have provided experienced managers and staff for a number of centralized support functions such as engineering, health physics, quality assurance, training, maintenance, and construction in order to effectively support the station management. Additionally, the organizational structure was specifically designed to provide inherent checks and balances. GPU Nuclear, its operational philosophy, its senior managers, and numerous other key personnel within the organization were reviewed in depth and endorsed by the ASLB. Over one hundred individuals, including top managers, appeared before that board in public hearings.

A broad look at the elements of GPU Nuclear which will be involved in the operation of TMI-1 reveals that the organization, down through two levels of management below the GPU Nuclear vice presidents, encompassing 86 such positions, contains 16 individuals that were with MetEd prior to the accident. Of the balance, 30 are new employees since the accident and the remaining 40 come from other components of the GPU System. The executive v.p. of GPU Nuclear and the vice president directly responsible for TMI-1 site operations are new.

At the time of restart we expect to utilize 38 currently licensed operators for TMI-1; 25 are newly licensed since the accident. Out of the remaining 13 that were licensed at the time of the accident, 10 are assigned to shift activities. These operators need to be viewed as a source of experience for the safe operation of TMI-1. Their prospective performance must also be assessed in light of (1) the fact that all have been licensed under the new testing criteria, (2) the ability of GPUN to provide 6 shift coverage for TMI-1 which provides one shift out of six for training, (3) the presence of shift technical advisors, and (4) significantly improved procedures.

As further assurance:

- 1) We will, prior to restart, reassign personnel such that no TMI-2 licensed operator will operate TMI-1 (except for the manager of operations who was licensed on Unit 2 but who was evaluated in depth and specifically endorsed by the ASLB), and

- 2) We will, prior to restart, add full time on shift operational quality assurance coverage by degreed engineers until the open issues are resolved. We would defer to the NRC should it wish to provide full time on shift resident inspector coverage of TMI-1 operations.

The balance of the TMI-1 site staff in engineering, maintenance, and supervisory roles contains numerous individuals with prior experience in the operation of TMI-1, experience which is important to the safe operation of TMI-1. The prospective performance of the current TMI-1 site staff must be assessed in light of (1) the evaluation by the ASLB, (2) the NRC's Jan. 1983 SALP and (3) the most recent inspection 50-289/83-10 which found very favorable results in the pervasive management areas of procedures, adherence, discipline, and attitude toward safety.

-4-

In order to provide added assurance;

We will reassign personnel such that those functions which provide an overview assessment, analysis, or audit of plant activities specifically;

- General Office Review Board
- Independent On-Site Safety Group
- Shift Technical Advisors
- Q/A Audit
- Q/A and Q/C Site Staff
- Licensing
- Radiation Control
- Emergency Preparedness

will contain only personnel with no pre-accident involvement as MetEd exempt employees at TMI-1 or 2. We will continue this constraint until the open issues are effectively resolved.

As a further action to strengthen TMI-1;

We have reallocated the priorities and assignments within the office of the president of GPU Nuclear, which office includes the president and executive vice president, such that TMI-1 will report to the executive vice president and such that he will be able to devote his prime attention to TMI-1 matters.

In a letter to Governor Thornburgh we have committed to the actions which we think necessary to satisfy the issues under appeal by the Commonwealth of Pennsylvania. A copy of that letter is attached.

We are taking these steps in order to provide additional assurances during the period necessary to resolve the open issues. We are confident that the actions necessary to provide these added assurances will not detract from the first priority of safe operations.

We will work with your staff to communicate the specifics of these steps.

In closing, we urge the Commission to expeditiously resolve the open issues so as to provide assurance that the learnings of the accident have been identified and implemented. We pledge our cooperation in that effort so that the TMI-1 management and staff can be accorded the full support of the Commission and the public.

Sincerely,



H. Dieckamp

lda

enclosure

cc: Governor Thornburgh

Herman Dieckamp
President



GENERAL
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UTILITIES
CORPORATION

100 Interpace Parkway
Parsippany, New Jersey 07054
201 263-6500
TELEX 136-482
Writer's Direct Dial Number

June 10, 1983

The Honorable Richard Thornburgh
State House
Harrisburg, Pennsylvania 17120

Dear Governor Thornburgh:

In your letter of June 2 to Chairman Palladino, you expressed concern about a number of issues relating to the restart of TMI-1 and stated specifically:

"I would find it particularly inappropriate for the Commission to take such action prior to hearing this Commonwealth's appeal on the operator cheating issue."

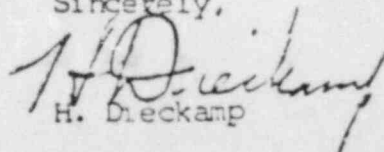
We had been hopeful that this matter would have been resolved by the appeal processes by this time. Since it is not, we have undertaken a review of the actions that we can take to resolve this issue and to provide assurances with respect to other issues. We want to inform you of the following commitments on the part of the Company with respect to the three remaining outstanding issues on which the Commonwealth filed exceptions with the Atomic Safety and Licensing Appeals Board on August 20, 1982.

- 1) The Company will not utilize anyone to operate TMI-1 who was found by the ASLB to have cheated on an NRC administered licensing exam or on a company administered training exam (Mr.H.).
- 2) The Company will not utilize Mr. DD (whose attitude was criticized by the ASLB) to operate TMI-1 or to train operating license holders or trainees.
- 3) The Company will direct the ASLB mandated training audit to specifically evaluate Mr. DD's performance as an instructor and the Company will comply with the findings in a timely and appropriate manner. Prior to the audit the Company will continue to monitor Mr. DD's performance and assign work consistent with that performance.

We believe that these commitments remove the concerns that are the subject of the Commonwealth's appeal before the Atomic Safety and Licensing Appeal Board.

We will be informing the NRC, with a copy to you, of additional commitments that we will also be completing prior to restart so as to provide additional assurance regarding protection of public health and safety and a further basis for confidence in the integrity of the management and staff which will be involved in the operation of TMI-1.

Sincerely,


H. Dieckamp

Herman Dieckamp
President



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Sincerely,



H. Dieckamp

lda

enclosure

cc: Governor Thornburgh



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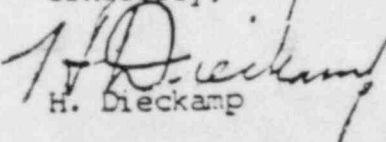
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Sincerely,


H. Dieckamp

GPU NUCLEAR PRESENTATION

UPDATED STATUS OF ACTIONS OUTLINED IN

H. DIECKAMP'S LETTER OF JUNE 10, 1983

TO THE U.S. NUCLEAR REGULATORY COMMISSION,

CHAIRMAN PALLADINO

Annotated to show changes from 6/27/83 through 11/18/83

TABLE OF CONTENTS

Page 1	11/18/83	Page 13	11/18/83
Page 1A	Added Page 11/18/83	Page 14	11/18/83
Page 2	6/27/83	Page 14A	Added Page 11/18/83
Page 3	6/27/83	Page 14B	Added Page 11/18/83
Page 4	6/27/83	Page 14C	Added Page 11/18/83
Page 5	6/27/83	Page 15	6/27/83
Page 6	6/27/83	Page 16	11/18/83
Page 6A	Added Page 11/18/83	Page 17	11/18/83
Page 7	11/18/83	Page 18	11/18/83
Page 8	11/18/83	Page 18A	6/27/83
Page 9	11/18/83	Page 19	6/27/83
Page 10	11/18/83	Attachment: GPU Nuclear "Areas of Concentration for the Office of the President" memorandum, dated June 9, 1983.	
Page 11	6/27/83		
Page 12	11/18/83		

NOTATIONS




- Pages dated 6/27/83 have not been updated. There have been no significant changes since that date. Vertical margin marks on pages dated 6/27/83 denote changes from 6/20/83.
- Significant changes from 6/27/83 status are reflected on new pages dated 11/18/83. Changes are marked with a vertical line.
- "Added Pages" - not included in 6/27/83 package, are so marked.

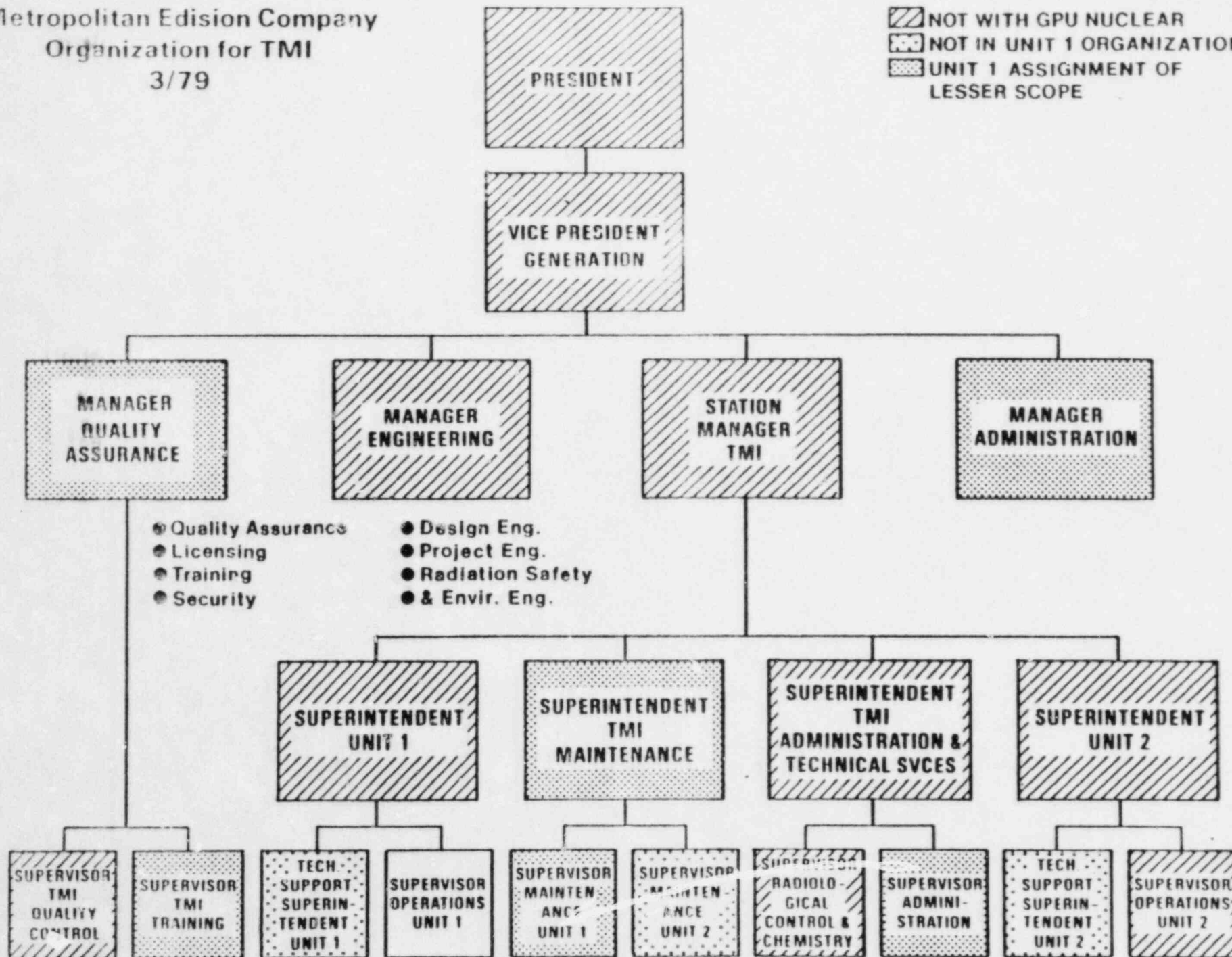
"AS A PRELIMINARY MATTER, IT IS USEFUL TO REVIEW THE METED ORGANIZATION THAT WAS RESPONSIBLE FOR OPERATION OF THE TMI STATION AT THE TIME OF THE ACCIDENT. NO MEMBER OF METED'S/TMI SENIOR MANAGEMENT IS NOW INVOLVED WITH TMI. FOUR LEVELS OF MANAGEMENT, THE METED PRESIDENT, VICE-PRESIDENT, STATION MANAGER, AND BOTH UNIT MANAGERS RESPONSIBLE FOR TMI AT THE TIME OF THE ACCIDENT ARE NOT WITH GPU NUCLEAR."

H. DIECKAMP LETTER DATED 6/10/83

6/27/83

Metropolitan Edison Company
Organization for TMI
3/79

 NOT WITH GPU NUCLEAR
 NOT IN UNIT 1 ORGANIZATION
 UNIT 1 ASSIGNMENT OF LESSER SCOPE



6/27/83

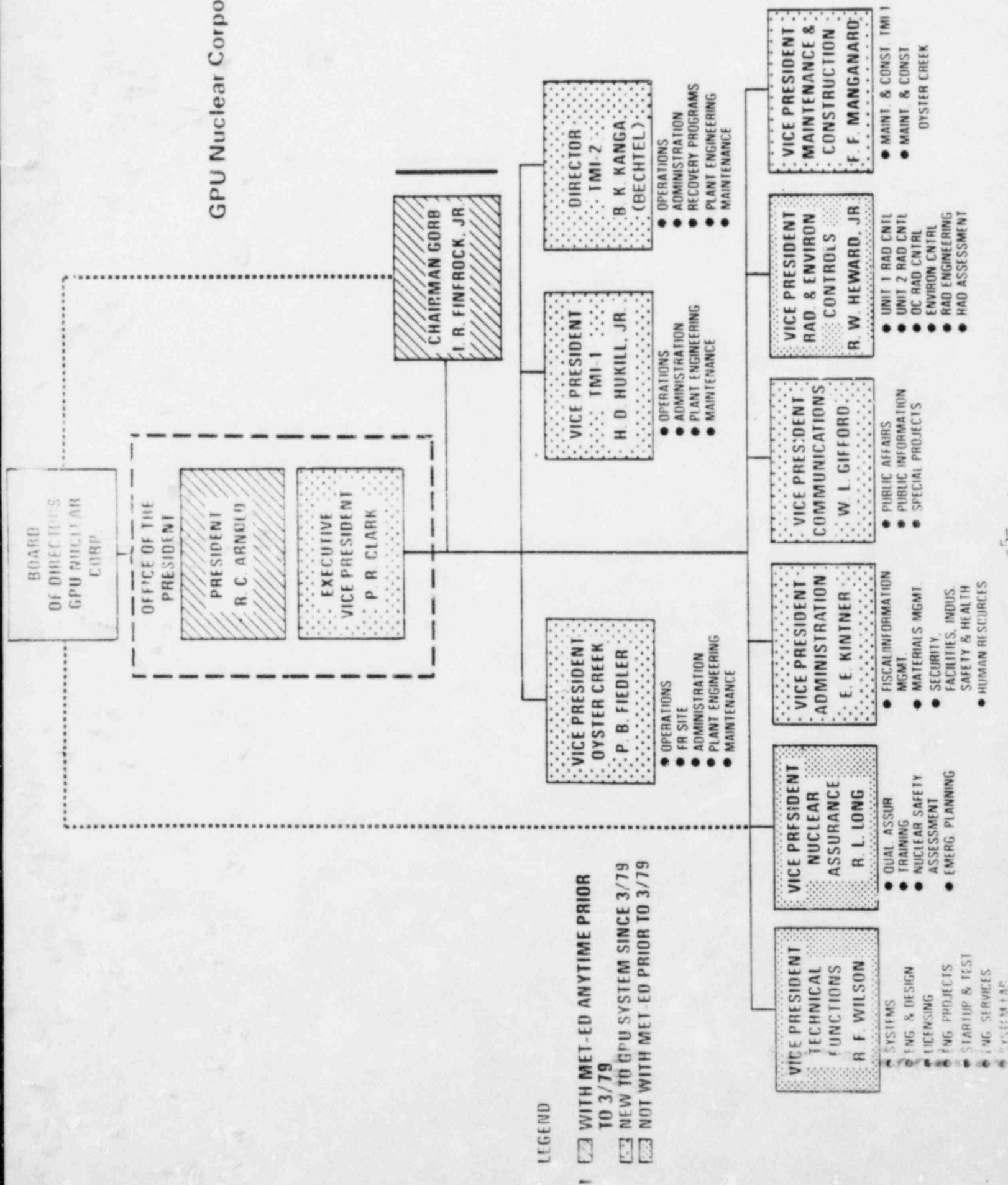
"THE SENIOR MANAGEMENT RESPONSIBLE FOR OPERATION OF TMI-1 TODAY IS DRAMATICALLY DIFFERENT THAN THAT WHICH EXISTED AT THE TIME OF THE ACCIDENT.

IN STRUCTURING GPU NUCLEAR WE HAVE PROVIDED DEDICATED ON SITE PERSONNEL FOR EACH OF THE GENERATING STATIONS WITH A HIGHLY EXPERIENCED SENIOR MANAGER ON SITE. WE HAVE PROVIDED EXPERIENCED MANAGERS AND STAFF FOR A NUMBER OF CENTRALIZED SUPPORT FUNCTIONS SUCH AS ENGINEERING, HEALTH PHYSICS, QUALITY ASSURANCE, TRAINING, MAINTENANCE, AND CONSTRUCTION IN ORDER TO EFFECTIVELY SUPPORT THE STATION MANAGEMENT."

H. DIECKAMP LETTER DATED 6/10/83

6/27/83

GPU Nuclear Corporation



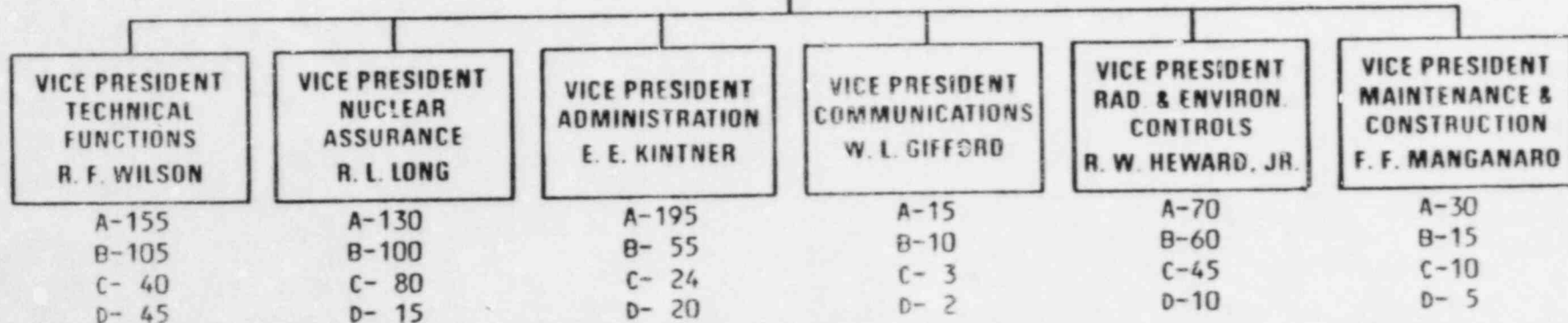
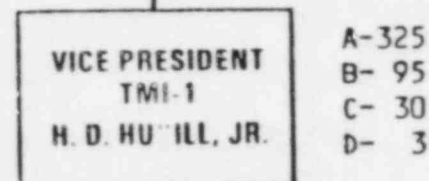
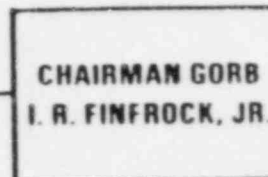
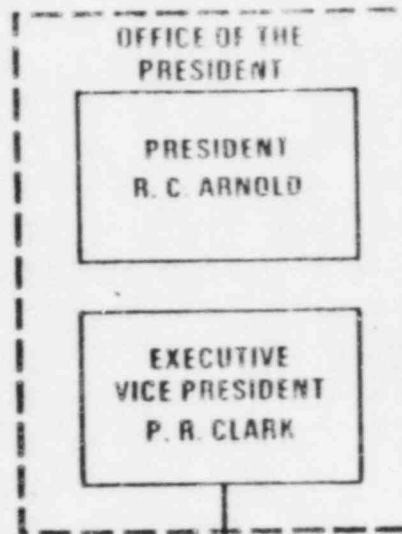
6/27/83

GPU Nuclear Corporation

LEGEND

A	APPROXIMATE TOTAL EMPLOYEES APPLIED TO TMI-1	922
B	KEY PERSONNEL INCLUDING MANAGERS, TECHNICAL/ PROFESSIONAL AND LICENSED OPERATORS	442
C	NUMBER OF THOSE IN "B" NEW TO SYSTEM (POST 3/79)	233
D	NUMBER OF THOSE IN "B" NOT WITH MET-ED (PRIOR TO 3/79)	100

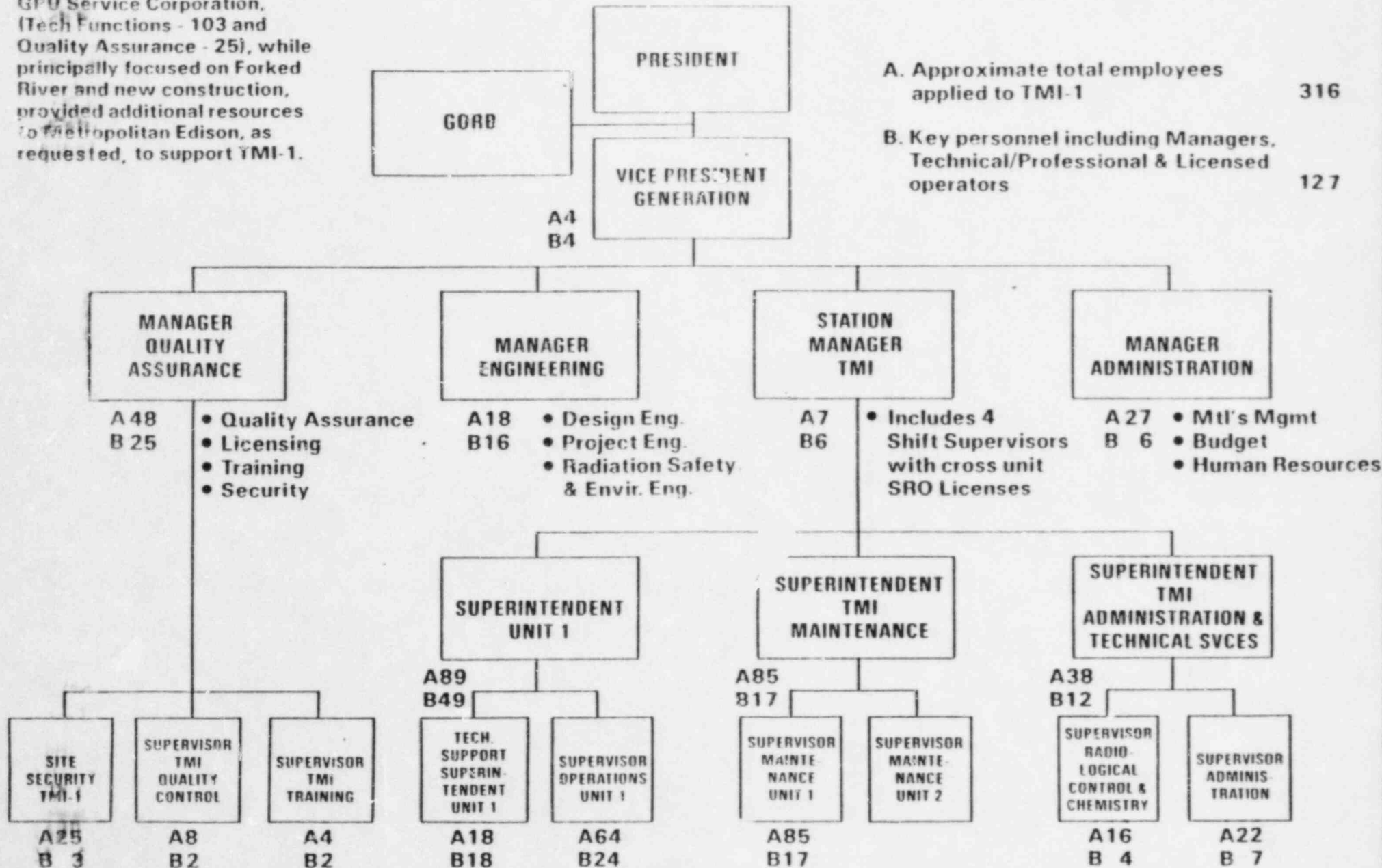
TOTAL



Estimated Resources Applied to TMI-1 as of 3/79

Metropolitan Edison Company Organization for TMI-1

GPU Service Corporation, (Tech Functions - 103 and Quality Assurance - 25), while principally focused on Forked River and new construction, provided additional resources to Metropolitan Edison, as requested, to support TMI-1.



"A BROAD LOOK AT THE ELEMENTS OF GPU NUCLEAR WHICH WILL BE INVOLVED IN THE OPERATION OF TMI-1 REVEALS THAT THE ORGANIZATION, DOWN THROUGH TWO LEVELS OF MANAGEMENT BELOW THE GPU NUCLEAR VICE PRESIDENTS, ENCOMPASSING 86 SUCH POSITIONS, CONTAINS 16 INDIVIDUALS THAT WERE WITH METED PRIOR TO THE ACCIDENT. OF THE BALANCE, 30 ARE NEW EMPLOYEES SINCE THE ACCIDENT AND THE REMAINING 40 COME FROM OTHER COMPONENTS OF THE GPU SYSTEM. THE EXECUTIVE V.P. OF GPU NUCLEAR AND THE VICE PRESIDENT DIRECTLY RESPONSIBLE FOR TMI-1 SITE OPERATIONS ARE NEW."

(86 positions has increased to 88 and 16 individuals has increased to 18 individuals)

H. DIECKAMP LETTER DATED 6/10/83

11/18/83

CEI NUCLEAR CORPORATION

COMPOSITION AND PRIOR HISTORY OF MANAGEMENT INVOLVED IN TMI-1 ACTIVITIES (EXCEPT STRICTLY ADMINISTRATIVE FUNCTIONS) DOWN THROUGH TWO LEVELS BELOW DIVISION V.P.

<u>Office of President</u>	(3)	Employee of MetEd <u>Prior to March 1979</u>	<u>Comment</u>
President		Yes <u>9/69 to 5/77</u>	<ul style="list-style-type: none"> . Development & performance of GPUN Organization 3/79 to date . NRC SALP . INPO . Special NRC Inspection . Safety Overview & Checks designed into organization including: GORB, Dir. Nuclear Assurance & Quality Assurance Dir. with direct access to Board of Directors . Shares Office/President with Exec. V.P. who also sits on Board of Dir.
Executive V.P.		No	<ul style="list-style-type: none"> . "...TMI-1 will report to the Executive Vice President and such that he will be able to devote his prime attention to TMI-1 matters."
Chairman - Gen. Office Review Boards (GORB)		Yes 6/52 to 5/71	<ul style="list-style-type: none"> . Assignments: Non-Nuclear 6/52-3/61 Saxton 3/61 - 4/70 Oyster Creek 5/70 - 7/81
<u>Division</u>			
<u>Technical Functions</u>	(31)	None except: TMI-1 Start-up and Test Mgr.	<ul style="list-style-type: none"> . Indirect role in plant safety. . Others set acceptance criteria. . Signoff by Plant. . Subject to Quality Assurance Plan, etc.
Technical & regulatory adequacy of all activities			
<u>Nuclear Assurance</u>	(16)	None	
Quality Assurance Nuclear Safety Assessment Emergency Preparedness Training			
<u>Maintenance & Construction</u>	(10)		
Establish policies, practices & procedures for Maintenance & Construction - carry out major maintenance & modifications		None except: Mgr - M&C Planning TMI-1 Mgr. M&C Tech. Support TMI-1	<ul style="list-style-type: none"> . Indirect impact on safety - . Does not set requirements for work or verify completion . Quality Assurance Plan & other overviews apply to M&C work

Employee of MetEd
Prior to March 1979

Comment

Division (continued)

Radiological & Environmental (10)
Controls Division

One
Radiological
Training Mgr.

Establish and implement
Radiological & Environmental
policies, practices and pro-
cedures and carry out monitor-
ing and surveillance programs.

- . Indirect role in plant safety-
- . Establishment & Enforcement
of Nuclear Management
Direction & Policies
- . Performance as evaluated by
ASLB, SALP, INPO, Special
NRC Inspection
- . Organizational Design provides
multiple overviews & checks

TMI-1 Division

(18) |

Operate and maintain TMI-1
safely, consistent with
corporate requirements, and
in compliance with laws,
regulatory requirements and
technical requirements.

V.P.

No

Operations & Maintenance Director

No

Mgr. Plant Operation

Yes

Mgr. Plant Chemistry

Yes

Mgr. Plant Maintenance

Yes

Admin & Technical Support

Yes

- . Establishment & Enforcement
of Nuclear Management
Direction & Policies
- . Performance as evaluated by
ASLB, SALP, INPO, Special
NRC Inspection
- . Organizational Design provides
multiple overviews & Checks

| Coord. Maint./Ops-

Yes

Employee of MetEd
Prior to March 1979

Comment

Division (continued)

TMI-1 Division (continued)

Plant Engineering Director

Yes

Lead Mechanical Engr

Yes

Lead Nuclear Engr.

Yes

Lead I&C Engr.

Yes

Lead Electrical Engr.

Yes

Fire Protection

Yes

Special Project

Yes

Chemistry

Yes

Establishment & Enforcement of
Nuclear Management Direction
& Policies

Performance evaluated by ASLB,
SALP, INPO, Special NRC
Inspection

Technical Functions role
including Design Control &
Review of Operating and
Emergency Procedures

Overview, particularly IOSRC

Mgr. Plant Administration

Yes

Coordinating Indirect role

Mgr. Plans & Programs

No

Total 88

"AT THE TIME OF RESTART WE EXPECT TO UTILIZE 38 CURRENTLY LICENSED OPERATORS FOR TMI-1; 25 ARE NEWLY LICENSED SINCE THE ACCIDENT. OUT OF THE REMAINING 13 THAT WERE LICENSED AT THE TIME OF THE ACCIDENT, 10 ARE ASSIGNED TO SHIFT ACTIVITIES. THESE OPERATORS NEED TO BE VIEWED AS A SOURCE OF EXPERIENCE FOR THE SAFE OPERATION OF TMI-1. THEIR PROSPECTIVE PERFORMANCE MUST ALSO BE ASSESSED IN LIGHT OF (1) THE FACT THAT ALL HAVE BEEN LICENSED UNDER THE NEW TESTING CRITERIA, (2) THE ABILITY OF GPUN TO PROVIDE 6 SHIFT COVERAGE FOR TMI-1 WHICH PROVIDES ONE SHIFT OUT OF SIX FOR TRAINING, (3) THE PRESENCE OF SHIFT TECHNICAL ADVISORS, AND (4) SIGNIFICANTLY IMPROVED PROCEDURES.

AS FURTHER ASSURANCE:

- 1) WE WILL, PRIOR TO RESTART, REASSIGN PERSONNEL SUCH THAT NO TMI-2 LICENSED OPERATOR WILL OPERATE TMI-1 (EXCEPT FOR THE MANAGER OF OPERATIONS WHO WAS LICENSED ON UNIT 2 BUT WHO WAS EVALUATED IN DEPTH AND SPECIFICALLY ENDORSED BY THE ASLB)..."

H. DIECKAMP LETTER DATED 6/10/83

6/27/83

Current Holders of TMI-1 Licenses as of 11/18/83

SRO License

16

<u>Status</u>	<u>Title</u>	<u>Current License #</u>	<u>Comment</u>
Will not be licensed at restart	Shift Supervisor	SOP3084	Reassigned (Incumbents (not licensed (as of 10/1/83
	Mgr. Radwaste Ops.	SOP2485	
	Supv. Non-Licensed	SOP3704	
	Op. Trng.		
(3) - Delete - not active			
Licensed on Unit 1 and 2 prior to 3/79	Mgr - Operations Ross (1)	SOP2053	<ul style="list-style-type: none"> Heavily reviewed by ASLB including cheating proceedings Performance as indicated in SLAP-Special Review Rarely functioned on Unit 2 Reexamined 1982 Cross Checks
Licensed prior to 3/79	Shift Supervisors	SOP4113	<ul style="list-style-type: none"> Relicensed under new procedures ASLB Review of cheating Special NRC Review Cross Checks including Shift Technical surveillance (new) Management Enforcement of Policy & Practice
	Shift Supervisor	SOP3235	
	Shift Supervisor	SOP3273	
	Shift Supervisor	SOP4263	
	Shift Supervisor	SOP2783	
	Engr. Sr. II	SOP3393	
	Supv. Simulator Inst.	SOP2784	
	Engr. Ass'n. Sr. III	SOP2782	
(License dropped 8/1/83)			
Shift Foreman	SOP10032	- SRO License granted 6/24/83, former RO Licensee OP4888.	
(8)			
Licensed subsequent to 3/79	Shift Foreman	SOP4358	<ul style="list-style-type: none"> Promoted to Shift Supv. Not active, reassigned Reassigned, Shift Foreman Resigned 9/83
	Shift Foreman	SOP4361	
	Shift Foreman	SOP4395	
	Shift Foreman	SOP4460	
	Shift Foreman	SOP4245	
	Shift Foreman	SOP3703	
	Shift Tech. Advisor	SOP4359	
	Shift Tech. Advisor	SOP4114	
Shift Tech. Advisor	SOP4360	- Resigned 9/83	
(7)			
Total SRO Licensees at Restart	16		

Current Holders of TMI-1 Licenses (con't)

<u>RO License</u>	<u>Status</u>	<u>Title</u>	<u>License</u>	<u>Comment</u>
Will not be licensed at restart		Control Room Operator	OP5010	Reassigned - not licensed
		(1) - delete - not licensed		
Licensed on Unit 1 prior to 3/79		Shift Foreman	OP4888	Granted SRO License SOP10032 (Added to page 12)
		Control Room Operator	OP5915	<ul style="list-style-type: none"> Relicensed under new procedures ALSB Review of cheating Special NRC Review Cross Checking including Shift Technical Surveillance (new) Management Enforcement Policy & Practice Corrected license number, same incumbent.
		Control Room Operator	OP3604	
		Control Room Operator	OP4647	
		Control Room Operator	OP4101	
		(4)		
Licensed subsequent to 3/79		Control Room Operator	OP6229*	*In training for SRO/Shift Foreman
		Control Room Operator	OP6293	
		Control Room Operator	OP6294*	
		Control Room Operator	OP6295	
		Control Room Operator	OP6296	
		Control Room Operator	OP5913	
		Control Room Operator	OP5751	
		Control Room Operator	OP6292	
		Control Room Operator	OP6230	
		Control Room Operator	OP6297	
		Control Room Operator	OP5909	
		Control Room Operator	OP5910	
		Admin Nuc Tech Trng	OP6030	
		(13)		
Total current ROs to be licensed at restart		(17)		
Recently passed NRC Reactor OP examination		Control Room Operator	(to be assigned) - OP6311 4/26/83	
		Control Room Operator	(") - OP6330 5/4/83*	
		Non-Licensed Op Trng.	(") - OP6329 5/4/83	
		(3)		
Additional RO Licenses since 6/10/83		Control Room Operator		- OP10043 6/24/83
		Control Room Operator		- OP10045 6/24/83
		(2)		
Total RO Licenses at Restart		(22)		
Total Licensed at Restart		(38)		

- 2) "WE WILL, PRIOR TO RESTART, ADD FULL TIME ON SHIFT OPERATIONAL QUALITY ASSURANCE COVERAGE BY DEGREED ENGINEERS UNTIL THE OPEN ISSUES ARE RESOLVED. WE WOULD DEFER TO THE NRC SHOULD IT WISH TO PROVIDE FULL TIME ON SHIFT RESIDENT INSPECTOR COVERAGE OF TMI-1 OPERATIONS."

THIS IS IN ADDITION TO SHIFT TECHNICAL ADVISORS (STA).

SEE "ADDED PAGES" 14A, B, & C FOR DETAILS OF EDUCATION TRAINING AND DUTIES OF SHIFT OPERATIONAL QUALITY ASSURANCE PERSONNEL.

OQA SHIFT MONITORING ENGINEERS STAFF AS OF 11/1/83

<u>Shift Monitor</u>	<u>Degree/Year</u>	<u>Other related Experience</u>	<u>GPU Start Date</u>	<u>GPUN Experience</u>
1	BSME/1982	Gilbert Associates - Engineering co-op Stu- dent in Piping Engineer- ing Department	06/21/83	Engineer I working in Corrective Maintenance group at TMI
2	BS Biology/ 1978	Harrisburg and Lower Allen Township Water Treatment Facilities - Operations and Shift Supervision	01/20/82	Chemistry Technician-A working at TMI
3	BSEE/1980	None	09/08/80	Electrical Engineer I working in Technical Functions Division
4	BS Biology/ 1979	Hershey Foods Corp. - Analytical Chemistry Department Employee	09/21/81	Chemistry Technician-A working at TMI
5	BSCE/1982	B&W, Lynchburg - Engineer- ing Co-op Student in Systems Mechanical Analysis Dept.	07/12/82	Engineer I working in Maintenance at TMI
6	BS Biology/	Derry Township Advanced Waste Water Treatment Facility - Chief Opera- tor of Process Control	07/12/82	Tour Support Clerk at TMI; trained in plant systems as a plant tour guide

- . All Shift Monitors satisfy the degree requirements specified in ANSI/ANS 3.1-1978, American National Standard for Selection and Training of Nuclear Power Personnel.
- . OQA Shift Monitors were selected from a group of twelve candidates using the following basis:
 - Degree and experience
 - Interest in success of program
 - Communication skills
 - Diversity of background for team concept.

SUMMARY OF QA SHIFT ENGINEER
INDOCTRINATION AND TRAINING

1. Initial Training Prior to Going On-Shift:

- a) A series of lectures and/or required reading which covered selected subjects in the areas of Administration, Operations, Maintenance, Surveillance, Chemistry, Rad Con, Security, Quality Assurance and TMI Systems overview. This training was a very broad brush overview and was composed of approximately 40 hours of lectures and 20 hours of required reading.
- b) Performed plant tours to be familiar with the plant spaces, locations and major components supporting technical specifications and start up/shutdown activities.
- c) Required to demonstrate the ability to complete an established shift monitoring checklist.
- d) Was orally examined to have sufficient knowledge of the above topics to be capable of determining the compliance of activities observed to these requirements.

2. Continuing Training Program

Based on input from Plant Management, QA, and the Shift Monitor's. Concentrated on areas of training that would enhance monitor's ability to verify compliance.

- a) During Operations or Major Plant Evolutions - receive an average of one week training every six weeks on the following:
 - . Operator Training (selected basis)
 - . Maintenance Technician Training (selected basis)
 - . Radiation Control Technician Training (selected basis)
 - . Chemistry Technician Training (selected basis)
 - . Quality Assurance Training
- b) On-the-Job Training under the direction of a certified Lead QA Monitor - two weeks out of every six weeks on a continuing basis.
- c) Accelerated Training Program - formal 3-4 week training program has been developed by the Training Department to improve monitors knowledge in:
 - . Plant Systems, Integrated Plant Operations, Maintenance Administration, Technical Specifications, TMI Procedural Structures and Administrative Controls, Radiological Release Requirements/Calculations, Plant Fundamentals, Chemistry Control, and Radiological Controls.
- d) Simulator Training - program scheduled for QA shift engineering monitors in 1984.

FUNCTIONAL ACTIVITY
GENERIC DESCRIPTION

OPERATIONS QA (OQA) SHIFT MONITORING ENGINEER

Personnel assigned as OQA Shift Monitoring Engineers shall be responsible to provide twenty-four hour shift coverage of operations activities conducted at TMI Unit 1. The individual will be trained in specific QA verification techniques orientated towards verifying that plant activities are being conducted in accordance with regulatory requirements and approved plant procedures and programs. Typical activities to be observed and verified will include items such as selected safeguard system valve lineups and surveillance tests, selected operator calculations for environmental releases and routine operations, selected Radiological Control practices, selected Security, Administrative and Fire Protection practices, selected Radwaste, Chemistry, Engineering and Maintenance practices.

OQA Shift Monitoring Engineers will be assigned to a shift rotation cycle that will overlap shift turnover activities and that will continually expose the individual to different shift supervision and practices. The individuals assigned will be accountable on a shift or other periodic basis to provide Operations QA and Plant Management with an assessment of the effectiveness and status of a shift activity compliance to activities selected for observation.

QA Shift Monitoring Engineers will receive administrative direction from OQA Operations/Radiological Controls Monitoring Supervisor. The individual will receive technical direction assignments on a shift or daily basis from the OQA Operations/Radiological Controls Monitoring Supervisor and the OQA Maintenance/Modification/Support Monitoring Supervisor.

OQA Shift Monitoring Engineers will interface with Unit shift supervision to keep them informed of problems discovered in shift activities they observe. OQA Monitoring Leads and Duty QA Monitors, QC Inspectors and QA Engineering personnel will be available to provide technical assistance and guidance to the OQA Shift Monitoring Engineers if needed for determining compliance of those activities observed with which specific training has not been provided to the OQA Shift Monitoring Engineer.

OQA Shift Monitoring Engineers will have the authority and responsibility to initiate QA Stop Work actions or initiate Unit shutdown recommendations in accordance with QA Department Project Procedures.

Reporting of observations made on a shift or daily basis will be made via a shift logging mechanism and the initiation of periodic OQA Monitoring Reports to OQA Supervision for review and distribution to Plant or other division management and supervision. This coupled with the interface with shift supervision will provide constant feedback to management on shift performance in meeting requirements.

"IN ORDER TO PROVIDE ADDED ASSURANCE:

WE WILL REASSIGN PERSONNEL SUCH THAT THOSE FUNCTIONS WHICH PROVIDE AN OVERVIEW ASSESSMENT, ANALYSIS, OR AUDIT OF PLANT ACTIVITIES SPECIFICALLY;

GENERAL OFFICE REVIEW BOARD

INDEPENDENT ON-SITE SAFETY GROUP

SHIFT TECHNICAL ADVISORS

Q/A AUDIT

Q/A AND Q/C SITE STAFF

LICENSING

RADIATION CONTROL

EMERGENCY PREPAREDNESS

WILL CONTAIN ONLY PERSONNEL WITH NO PRE-ACCIDENT INVOLVEMENT AS EXEMPT METED EMPLOYEES AT TMI-1 OR 2. WE WILL CONTINUE THIS CONSTRAINT UNTIL THE OPEN ISSUES ARE EFFECTIVELY RESOLVED."

H. DIECKAMP LETTER DATED 6/10/83

6/27/83

FUNCTIONS WHICH PROVIDE AN OVERVIEW ASSESSMENT, ANALYSIS, OR AUDIT OF PLANT ACTIVITIES

<u>General Office Review Board</u>	<u>Employee of MetEd Prior to March 1979</u>	<u>Comment</u>
-- Consider potentially significant nuclear and radiation safety and related management matters		
-- Reports to Office of the President, GPUN. Has direct access to Board of Directors, GPUN --		
10 members - 5 GPUN, - 5 Outside	Chairman GORB	. Assignments: Non-Nuclear 6/52-2/61 Saxton 3/61 - 4/70 Oyster Creek 5/70 - 7/81

SEE PAGE 18A

Corporate Nuclear Safety Assessment Department (NSAD)

-- Investigate assess & recommend... to assure overall safety. Reports to VP & Director, Nuclear Assurance Division.	
Manager plus 3 professionals	None

Independent On-Site Safety Review Group

-- Full time - on-site Reports offsite to Manager, NSAD -		
Manager + 4 professionals	None	Two prior incumbents reassigned

FUNCTIONS WHICH PROVIDE AN OVERVIEW ASSESSMENT, ANALYSIS, OR AUDIT OF PLANT ACTIVITIES.

<u>Shift Technical Advisors</u>	<u>Employee of MetEd Prior to March 1979</u>		<u>Comment</u>
- Degreed engr. specifically qualified. On-Shift - Report to Technical Functions Division - not to Plant	3	None	One prior incumbent reassigned, as planned. One re- signed; Two still in training; Four additional in train- ing as of 9/83. Anticipate qualifi- cation as follows: One - 12/83 One - 1/84 Four - 5/84
<u>Radiological Controls</u>			
- exempt personnel below management	13	None	
<u>Emergency Preparedness</u>			
- exempt personnel below management	5	None	One prior incumbent reassigned.
<u>Licensing</u>			
- exempt personnel below management	12	None	

FUNCTIONS WHICH PROVIDE AN OVERVIEW ASSESSMENT, ANALYSIS, OR AUDIT OF PLANT ACTIVITIES

<u>Division</u>	Exempt MetEd Employee Assigned to TMI Site <u>3/77 to 3/79</u>	<u>Comment</u>
<u>Quality Assurance</u>		
QA Audit & Q/A Q/c TMI-1 Site Staff		
	52 Ops QA Mgr	
	Maint M&I Monitoring Supv	
	Ops Radcon Monitoring Supv	
	QC Inspector	
	QA Engineer	6/10/83 Incumbents have been reassigned and replaced as of 9/1/83
	QC Project Engineer	
	QC NDE Welding Supv	
	Admin Trng Monitor	
	TMI Audit Supv	
	QA Monitor	

GPUN MANAGEMENT OR OVERSIGHT PERSONNEL WHO WERE MEMBERS OF THE PREDECESSOR TMI GORB PRIOR TO
TO 3/79

<u>PRESENT POSITION</u>	<u>DATE OF ASSIGNMENT TO PREDECESSOR TMI GORB</u>
. President	02/73*
. Chairman GORBs	09/71
. V.P. Radiological & Env. Controls & Member TMI-1 GORB	11/69
. Dir. Licensing & Regulatory Affairs & Member TMI-1 GORB	09/71
. Outside Member TMI-1 GORB	11/69

COMMENTS:

- . Open issues unlikely to involve these individuals solely because of their prior GORB membership. Any other sources of vulnerability, considered above.
- . Current TMI-1 GORB strengthened relative to 3/79
 - Structure and controls of GPUN provide better visibility of day to day performance and permit more effective review.
 - Previously two outside members; now a minimum of four required.
 - Greater emphasis on GORB role and functions reflecting lessons from TMI-2 accident.
 - Chairman's only other assignments are Chairman of TMI-2 and Oyster Creek GORB's
 - Formal direct access to Board of Directors.
 - Increased Staff Support.
 - Expanded use of subcommittees.

*Left GORB 3/77

"WE HAVE REALLOCATED THE PRIORITIES AND ASSIGNMENTS WITHIN THE OFFICE OF THE PRESIDENT OF GPU NUCLEAR, WHICH OFFICE INCLUDES THE PRESIDENT AND EXECUTIVE VICE PRESIDENT, SUCH THAT TMI-1 WILL REPORT TO THE EXECUTIVE VICE PRESIDENT AND SUCH THAT HE WILL BE ABLE TO DEVOTE HIS PRIME ATTENTION TO TMI-1 MATTERS."

H. DIECKAMP LETTER DATED 6/10/83

6/27/83

Inter-Office Memorandum

Date June 9, 1983

Subject Areas of Concentration for
the Office of the President



To Vice President, TMI-1
Director, TMI-2
Vice President, Oyster Creek
Acting Director, Administration
Vice President, Communications
Vice President, Radiological & Environmental Controls
Vice President, Maintenance & Construction
Vice President, Technical Functions
Vice President, Nuclear Assurance
Chairman, GORBs

Location Headquarters/Parsippany

The Office of the President memorandum, same subject, dated January 22, 1982, described the then current areas of concentration for the Office of the President. This memorandum describes revised areas of concentration effective July 1, 1983. It supersedes prior guidance.

The officer listed below as "lead" for a particular activity is the normal direct reporting point within the Office of the President for the subject activity. Substantive written communications addressed to the officer with lead for a particular activity should be copied to the other O/P officer. As before, any item can be referred to, or addressed to, either the President or the Executive Vice President in cases where the other is unavailable on a schedule suitable for the matter in question.

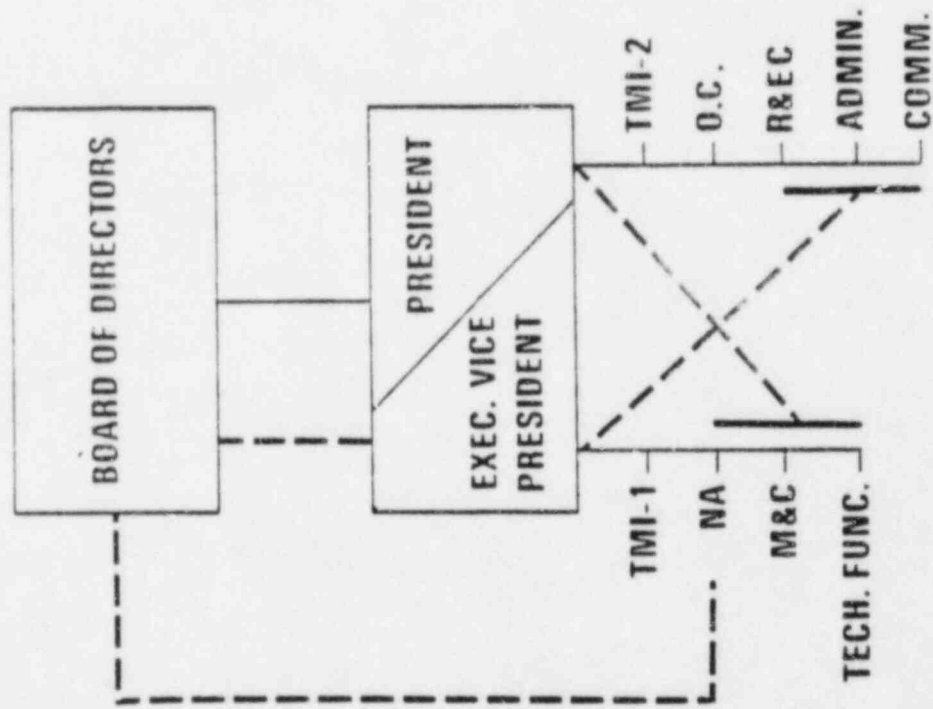
<u>AREA</u>	<u>O/P LEAD</u>
TMI-2	President
TMI-1	Executive Vice President
Oyster Creek	President
Technical Functions	Executive Vice President (Vice President, Technical Functions will assist the Executive Vice President in keeping the President briefed on Oyster Creek and TMI-2 specific activities)
Communications	President

O/P LEAD

cc: Executive Vice President
GPU Nuclear Board of Directors

AREAS OF CONCENTRATION FOR

OFFICE OF PRESIDENT CPUN



6/20/83

EDWIN E. KINTNER

M.S., Nuclear Physics and Engineering, Massachusetts Institute of Technology

M.S., Marine Engineering, Massachusetts Institute of Technology

B.S., U.S. Naval Academy

Before joining GPU Nuclear Corporation, in June 1983, as Vice President - Administration, Mr. Kintner was Assistant to the Vice President, for Advanced Technologies, of TITAN Systems, Inc. Prior to joining TITAN, he was, for five years, director of the U.S. Magnetic Fusion Program in the Department of Energy and its predecessor agency, the Energy Research and Development Administration. During his tenure, the program accelerated from an annual expenditure of about \$250 million to more than \$450 million and gained recognized world leadership in this highly advanced technology.

For five previous years, Mr. Kintner was Assistant Director for Reactor Engineering, and then Deputy Director of the Atomic Energy Commission's Reactor Development Division. During that time the U.S. breeder reactor program held the highest priority among U.S. energy development programs.

Mr. Kintner was one of the first officers to join the U.S. Navy's program for development of nuclear propulsion of ships, and served in various positions in that program, reporting directly to VADM Rickover for 14 years. One such position was Project Officer for the world's first nuclear powered ship, the USS Nautilus. He was also Head, Advanced Design Group, Naval Reactors Division during the conceptual designs of most of the nuclear propulsion plants in use in the Navy today and the first Nuclear Power Superintendent at Mare Island Naval Shipyard.

After retiring from the Navy, Mr. Kintner was for two years, President and General Manager of the South Portland Engineering Company, a Maine firm engaged in heavy engineering and manufacturing.

Among awards granted to Mr. Kintner during his professional career are the Secretary of the Navy commendation medal, the title of Distinguished Alumnus of M.I.T., and the highest bonus award of the Senior Executive Service.

Mr. Kintner was Chairman of the U.S. Side of the U.S./USSR Joint Fusion Power Coordinating Committee; U.S. representative to the International Fusion Research Council; U.S. representative to the International Energy Agency's Fusion Power Coordinating Committee; Chairman of the U.S. Side of the U.S./Government of Japan Fusion Power Coordinating Committee; and Chairman of the U.S. Fusion Power Coordinating Committee.