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RELATE. CORRESPONDENCE

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October 9, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

LICENSEE'S ANSWERS TO INTERVENOR THREE MILE ISLAND ALERT'S
FOURTH SET OF INTERROGATORIES TO GENERAL PUBLIC UTILITIES

Licensee, GPU Nuclear Corporation, pursuant to 10 C.F.R.
section 2.740b, hereby submits the following answers to "Inter-
venor Three Mile Island Alert's Fourth Set of Interrogatories
to General Public Utilities."

I. GENERAL OBJECTIONS

1. The Licensing Board has ruled that knowledge of plant
conditions other than those related to the generation and sub-
sequent combustion of hydrogen, pressure spike and initiation
of containment spray, possessed by persons other than
Mr. Dieckamp, is not relevant to the Mailgram issue (Memorandum

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and Order Ruling on First GPU - TMIA Discovery Dispute, August 31, 1984, Pages 3-4). On the basis of this ruling, Licensee objects to those interrogatories or portions of interrogatories which seek such irrelevant information, particularly knowledge of persons other than Mr. Dieckamp of incore thermocouple indications. In addition, because the interrogatories are not only irrelevant but also extremely onerous in inquiring into virtually every conversation and action of a host of individuals, Licensee also objects to these interrogatories as oppressive, unduly burdensome and expensive.

Licensee has also limited its responses to interrogatories not objected to in total to include only matters relating to generation and subsequent combustion of hydrogen, pressure spike and the initiation of containment spray. Such limitation of a response is noted in the response by reference to this General Objection.

2. Much of the information sought by TMIA in these interrogatories has previously been obtained by Licensee and placed in the Discovery Room in the form of questionnaires issued by Licensee to many of its employees and others. Where reference to the questionnaires will answer an interrogatory, Licensee has so noted in its response and had not reiterated the information contained in the questionnaires. To the extent such interrogatory would otherwise require, Licensee objects to it as oppressive, unduly burdensome and expensive.

3. The Licensing Board's limitation of discovery set out in its August 31, 1984 Memorandum and Order, supra, applied by its terms only to interrogatories and document requests. Inquiry into a deposition witness' knowledge of plant conditions is not limited insofar as it pertains to communications with Mr. Dieckamp. Many of the persons to whom TMIA's Fourth Set of Interrogatories have been specifically directed have been deposed or have been noticed for deposition, thereby affording TMIA the opportunity, of which it is taking full advantage, to make such inquiries as it chooses into the same subjects as are now the subject of these interrogatories. Where such is the case, Licensee has so noted in its response and has not provided an interrogatory response. To require Licensee to respond to the same questions again would be oppressive, unduly burdensome, and expensive.

II. INTERROGATORIES

Interrogatory 1.

The following interrogatories refer to the "Moore notes", which were attached to the September 17, 1980 Memorandum from Mr. Wallace to Mr. Arnold.

(a) Explain the circumstances under which Mr. Moore took all notes which appear as an attachment to the Arnold memorandum. Include in your explanation identification of the following:

(i) the purpose for his taking each portion of the notes;

(ii) Mr. Moore's location at the time he took each portion of the notes, including a description of which portions of the notes were taken at each place;

(iii) the persons to whom, on March 28, 1979, Mr. Moore communicated the information contained in his notes and the purpose for which he communicated that information to each such person. This subpart should be answered with regard to each portion of the notes, subdivided by time of notation, so that it is clearly understood what portion of the notes or the information contained in the notes were transferred to each person;

(iv) the action, if any, that any such person to whom the information was communicated, took on March 28, 1979 after receiving such information, insofar as it related to actions related to TMI-2 reactor or the ongoing accident;

(v) The time, purpose, and location at which Mr. Moore transmitted the information in his notes, specifically the information that in-core thermocouple temperatures had exceeded 2500 degrees, to Mr. Arnold, Mr. Wallace, or Mr. Dieckamp, if any of these three individuals were identified in response to subpart (iii) above;

(vi) whether on March 28 or up to 12:00 p.m. on March 29, 1979, the information that in-core thermocouple temperatures had exceeded 2500 degrees led to any discussion about the possible generation of hydrogen or the possibility of serious core damage;

(vii) whether or not any conclusion was reached on March 28 up until 12:00 p.m. on March 29, 1979, as to whether or not in-core thermocouple temperatures in excess of 2500 degrees indicated hydrogen generation or serious core damage;

(viii) if the answer to subpart (vii) is affirmative, whether or not any such conclusion was communicated to licensee GPU upper management, the NRC, or the Commonwealth of Pennsylvania authorities.

Response 1.

General Objection 1. General Objection 3 is also applicable in that Jim Moore has been deposed by TMIA in these areas.

Interrogatory 2.

State whether any of the following individuals were aware on March 28, 1979 of in-core thermocouple temperatures at TMI-2 in excess of 2200 degrees on that date:

- (a) Robert Arnold;
- (b) E.G. Wallace;
- (c) Ron Williams;
- (d) Robert Keaton;
- (e) William Hirtz;
- (f) Rich or Richard Lentz;
- (g) T.G. (Gary) Broughton.

Response 2.

General Objection 1. General Objection 3 is also applicable in that Robert Arnold, Richard Lentz and T. Gary Broughton have been deposed or noticed for deposition by TMIA.

Interrogatory 3.

Describe the activities of the following individuals on March 28, 1979, including identification of the following:

- (a) the location of the individual at all points during the day;
- (b) all communications the individual had at any time during the day, with licensee personnel, the NRC, or Commonwealth of Pennsylvania authorities;
- (c) all information each individual possessed on March 28, 1979 concerning the following accident conditions or events: the possible generation or combustion of hydrogen, the actuation of containment sprays, any direction not to activate equipment in order not to create a spark or combustion of noncondensable gas; in-core thermocouple temperatures which indicated temperatures greater than 2200 degrees;
- (d) conclusions or evaluations reached as a result of any information any individual possessed concerning any of the above-listed conditions of the reactor on March 28, 1979;

(e) all actions taken by any GPU personnel as a result of or in response to any conclusion or evaluation identified in subpart (d) above, and the person taking each such action; the time and date of taking each such action; and the purpose or reason for taking each such action;

(f) with respect to each action identified in response to subpart (e) above, identify each person who is aware that such action was taken in response to any conclusion identified in response to subpart (d) above;

These interrogatories are to be answered with respect to the following individuals:

- (a) Robert Arnold;
- (b) Herman Dieckamp;
- (c) E.G. Wallace;
- (d) Ron Williams;
- (e) William Hirts;
- (f) Rich or Richard Lentz;
- (g) T.G. (Gary) Broughton;
- (h) D.K. Croneberger;
- (i) Mr. Capodanno;
- (j) Mr. Lehman;
- (k) Mr. Noonan.

Response 3.

3.(a) Licensee requested each individual to respond to this interrogatory. Their responses are as follows:

(a) Robert Arnold - was at GPU Service offices in Mountain Lakes, N. J. until about 8:00 p.m., at which time he returned home.

(b) Herman Dieckamp - see Licensee's response to TMIA's First Set of Interrogatories, number 16.

(c) E.G. Wallace - was at a seminar at the Hearthstone Inn in Parsippany, N. J. until 12 noon. At 12 noon he went to GPU Service offices in Mountain Lakes, N. J. and stayed there until 9:30 p.m., at which time he returned to his residence.

(d) Ron Williams - was at Oyster Creek Station, Lacey Township, N. J., and returned to his residence in the evening.

(e) William Hirst - was in San Diego, California all day.

(f) Richard Lentz - was at GPU Service offices in Mountain Lakes, N. J. until about 11 a.m. at which time he went home. He left for TMI about 12 noon, arriving at the TMI Observation Center between 3 p.m. and 4 p.m., and remained there until about 6 p.m., at which time he proceeded to the TMI-2 Control Room. He remained in the TMI-2 Control Room for several hours and then returned to the TMI Observation Center where he remained through the remainder of the day.

(g) T.G. (Gary) Broughton - arrived at GPU Service offices in Mountain Lakes, N. J. about 8 a.m. He went home about 11 a.m. and left for TMI about noon, arriving at the TMI

Observation Center between 5 p.m. and 6 p.m. Shortly thereafter he left for dinner and returned later, leaving the Observation Center for the day at about 9 p.m.

(h) D.K. Croneberger - was at the GPU Service offices in Mountain Lakes, N. J. from approximately 8 a.m. to 7 p.m. He spent the remainder of the day at his residence.

(i) Mr. Capodanno - was at GPU Service offices in Mountain Lakes, N. J. until sometime late in the afternoon, at which time he left for the Newark, N. J. airport for a flight to Chicago, Illinois.

(j) Mr. Lehmann - was at GPU Service offices in Mountain Lakes, N. J. until about 12 noon at which time he left for Three Mile Island, arriving there about 4 p.m. For the remainder of the day he was at the TMI Observation Center.

(k) Mr. Moore - was at the GPU Service offices in Mountain Lakes, N. J. until shortly after the conclusion of a meeting that commenced at 10:05 a.m. He left that office building for Three Mile Island prior to noon, arriving at the North Gate of Three Mile Island about 2 p.m., but did not gain access. He then proceeded to the TMI Observation Center where he remained throughout the remainder of the day.

3.(b)-(f) General Objection 1. General Objection 3 is also applicable in that Messrs. Arnold, Dieckamp, Lentz,

Broughton and Moore have been deposed or have been noticed for deposition by TMIA. Information requested is available in the questionnaire responses of Messrs. Arnold, Dieckamp, Wallace, Lentz, Broughton, Croneberger, Lehmann and Moore.

Mr. Williams' questionnaire was returned unopened. Licensee obtained a new address for Mr. Williams (11 Cottonwood Road, Morristown, N. J. 07960) and has placed the questionnaire in the mail to him. Additionally, Licensee has sent questionnaires to Messrs. Hirst and Capodanno. Upon receipt of Messrs. Hirst's, Capodanno's and Williams' questionnaire responses, copies will be placed in the Discovery Room.

Interrogatory 4.

Identify all conversations on March 28, 1979, between persons at the TMI site and licensee's offices in Parsippany concerning the conditions of the reactor or events occurring at the reactor site in which the following individuals participated, or of which the following individuals were aware:

- (a) Robert Arnold;
- (b) E.W. Wallace;
- (c) Robert Keaton;
- (d) James Moore;
- (e) Ron Williams;
- (f) Bill Hirts.

Include in your response identification of the following telephone conversations identified by Mr. Wallace in his deposition during the GPU v. B&W litigation:

- (a) a conversation with Leland Rogers during the afternoon of March 28;
- (b) a conversation with an individual located at the Observation Center;

(c) a conversation with an individual located in Harrisburg at 4:00 or 5:00 p.m., during which a recommendation was discussed to start a reactor coolant pump. Mr. Wallace states he does not remember if the call was made to the Control Room, the Shift Supervisor's Office, or the Observation Center.)

Response 4.

General Objection 1. The information requested is contained in completed questionnaires, available in the Discovery Room. Licensee, upon receipt of completed questionnaires of Messrs. Williams and Hirst, will place copies in the Discovery Room. General Objection 3 is also applicable in that R. C. Arnold and J. P. Moore have been deposed by TMIA.

None of the telephone conversations identified by Mr. Wallace in his deposition during the GPU vs. B&W litigation concerned or were related to hydrogen generation and subsequent combustion, actuation of containment spray or the pressure spike.

Interrogatory 5.

What are the duties and responsibilities of each of the following persons called into Mr. Arnold's office in the early afternoon of March 28, 1979, to discuss the TMI accident and the conditions of the reactor, referenced in Mr. Wallace's B&W Deposition:

- (a) James Moore;
- (b) E. Wallace;
- (c) Ron Williams;
- (d) Robert Keaton;
- (e) Bill Hirts.

Response 5.

Licensee requested each individual to respond to this interrogatory. Their responses follow:

(a) James Moore - was not present in Mr. Arnold's office in the early afternoon on March 28, 1979;

(b) E. Wallace - with respect to that meeting he had no specific duties or responsibilities;

(c) Ron Williams - was not present in Mr. Arnold's office in the early afternoon on March 28, 1979;

(d) Robert Keaten - with respect to that meeting he had no specific duties or responsibilities;

(e) Bill Hirst - was not present in Mr. Arnold's office in the early afternoon on March 28, 1979.

Interrogatory 6.

Identify all persons who were routinely located at Parsipanny, N.J., who were permitted access or entrance to the TMI-2 Control Room at any time during March 28, 1979, and all persons who granted any persons identified above that authority and/or permission to enter the TMI-2 control room;

Identify the purpose or reason each such person identified above was permitted access to the TMI-2 control room at that time.

Response 6.

General Objection 1. Richard Lentz was the only person routinely located at GPU Service offices in New Jersey who went into the TMI-2 Control Room at any time during March 28,

1979. According to Mr. Lentz, his access was granted by George Kunder for the purpose of obtaining copies of plant data.

Interrogatory 7.

Identify all documents which record or memorialize each communication and conversation identified in Interrogatory Nos. 3 and 4 above.

Response 7.

General Objection 1. The information requested is contained in completed questionnaires, available in the Discovery Room, except for Messrs. Capodanno, Hirst and Williams. Licensee, upon receipt of their completed questionnaires, will place copies in the Discovery Room.

Interrogatory 8.

Identify with respect to the following individuals whether or not they were aware on March 28, 1979 that the occurrence of cladding temperatures in excess of 2200 degrees F. exceeded those specified in 10 CFR 50.46:

- (a) Gary Miller;
- (b) George Kunder;
- (c) Ivan Porter;
- (d) Michael Ross;
- (e) Theodore Illjes;
- (f) William Zewe;
- (g) Edward Frederick;
- (h) Craig Faust;
- (i) Joseph Chwastyk;
- (j) Brian Mehler;
- (k) Robert Arnold;

- (l) James Moore;
- (m) E. Wallace;
- (n) Robert Keaton;
- (o) J.G. Herbein.

Response 8.

General Objection 1. General Objection 3 is also applicable in that Gary Miller, George Kunder, Theodore Illjes, Craig Faust, Joseph Chwastyk, Robert Arnold, James Moore, Brian Mehler, Ivan Porter, Michael Ross, and J. G. Herbein have been deposed by TMIA.

Interrogatory 9.

Identify which if any of the persons listed in Interrogatory No. 8 above were aware on March 28, 1979, or March 29, 1979, that in-core temperatures in excess of 2200 degrees F had been measured?

With regard to any individual identified above, state the time at which he so learned of the temperatures and the indicator from which he learned of the temperatures, i.e. computer printout, digital voltmeter or fluke thermometer.

Response 9.

General Objection 1. General Objection 3 is also applicable; see response to interrogatory 8.

Interrogatory 10.

Identify all persons listed in response to Interrogatory No. 9 above, who did not believe the accuracy or validity of the temperatures, and the reason(s) for such disbelief.

Response 10.

General Objection 1. General Objection 3 is also applicable; see response to interrogatory 8.

Interrogatory 11.

Identify all communications on March 28, 1979, among GPU personnel, or between GPU and B&W personnel, concerning the fact that in-core thermocouple readings of temperatures in excess of 2200 degrees F had been measured on March 28, 1979.

Response 11.

General Objection 1. General Objection 3 is also applicable; see response to interrogatory 8.

Interrogatory 12.

Identify all communications, discussions, conversations, or other contracts among GPU personnel, or between GPU and B&W personnel, related to whether in-core thermocouple readings of temperatures in excess of 2200 degrees F indicated that hydrogen had been generated.

Response 12.

General Objection 1. General Objection 3 is also applicable; see response to interrogatory 8.

Interrogatory 13.

Identify all communications, discussions, conversations, or other contacts among GPU personnel, or between GPU and B&W personnel, related to whether in-core thermocouple readings of temperatures in excess of 2200 degrees F indicated that the core had been damaged.

Response 13.

General Objection 1. General Objection 3 is also applicable; see response to interrogatory 8.

Interrogatory 14.

Describe any electrical malfunction of any kind which would appear on a wide-range or narrow-range pressure recorder of the same shape, wave length or character as the pressure spike which was recorded on a wide-range and narrow-range recorder at approximately 1:50 p.m. on March 28, 1979 at TMI-2.

Response 14.

In order for Licensee to respond to this interrogatory it would be necessary for Licensee to create "as built" plant design conditions at TMI-2. This would be oppressive, burdensome and conceivably impossible due to the present condition of TMI-2. Thus, an in-depth and adequate analysis to determine whether any electrical malfunction of any kind would appear on a wide-range or narrow-range pressure recorder of the same shape, wave length or character as the pressure spike which was recorded on a wide-range and narrow-range recorder at approximately 1:50 p.m. on March 28, 1979 at TMI-2 would involve a tremendous undertaking by Licensee. Licensee therefore objects to this interrogatory.

Interrogatory 15.

Describe any electrical malfunction of any kind which could lead to the reactor building chart recordings of the pressure spike and the initiation of containment sprays which occurred almost simultaneously on March 28, 1979 at or about 1:50 p.m.

Response 15.

In order for Licensee to respond to this interrogatory it would be necessary for Licensee to recreate "as built" plant design conditions at TMI-2. This would be oppressive, burdensome and conceivably impossible due to the present condition of TMI-2. Thus, an in-depth and adequate analysis to determine whether any electrical malfunction of any kind could lead to the reactor building chart recordings of the pressure spike and

the initiation of containment spray which occurred almost simultaneously on March 28, 1979 at or about 1:50 p.m. would involve a tremendous undertaking by Licensee. Licensee therefore objects to this interrogatory.

Interrogatory 16.

Identify all actions, including any communications, inquiries, investigations or other efforts, Mr. Dieckamp took prior to May 9, 1979, to determine whether any licensee or B&W personnel interpreted the pressure spike on March 28, 1979, to indicate core damage.

Response 16.

Prior to May 9, 1979, Mr. Dieckamp undertook no special inquiries, investigations, communications or other efforts to determine whether any licensee or B & W personnel interpreted the pressure spike on March 28, 1979, to indicate core damage. The basis for the statements in the Mailgram are outlined in Licensee's response to TMIA's First Set of Interrogatories, numbers 54, 55, 56 and 58.

Interrogatory 17.

Identify all actions, including any communications, inquiries, investigations or other efforts Mr. Dieckamp took prior to May 9, 1979, to determine whether any licensee or B&W personnel interpreted initiation of containment sprays on March 28, 1979 to indicate core damage.

Response 17.

Prior to May 9, 1979, Mr. Dieckamp undertook no special inquiries, investigations, communications or other efforts to determine whether any licensee or B & W personnel interpreted initiation of containment spray on March 28, 1979 to indicate

core damage. The basis for the statements in the Mailgram are outlined in Licensee's response to TMIA's First Set of Interrogatories numbers 54, 55, 56 and 58.

Interrogatory 18.

Identify all actions, including any communications, inquiries, investigations or other efforts Mr. Dieckamp took prior to May 9, 1979, to determine that no one had withheld any information about the pressure spike, the initiation of containment sprays, or reactor core damage.

Response 18.

Prior to May 9, 1979, Mr. Dieckamp undertook no special inquiries, investigations, communications, or other efforts to determine that no one had withheld any information about the pressure spike, the initiation of containment spray, or reactor core damage. The basis for the statements in the Mailgram are outlined in Licensee's response to TMIA's First Set of Interrogatories, numbers 54, 55, 56 and 58.

Interrogatory 19.

Identify all actions, including any communications, inquiries, investigations or other efforts, Mr. Dieckamp took prior to May 9, 1979 to determine whether any GPU or B&W personnel believed on March 28, 1979b that the pressure pulse which was recorded indicated a real increase in pressure, or indicated the generation and/or combustion of hydrogen.

Response 19.

Prior to May 9, 1979, Mr. Dieckamp undertook no special inquiries, investigations, communications or other efforts to determine whether any GPU or B&W personnel believed on March 28, 1979, that the pressure pulse which was recorded

indicated a real increase in pressure, or indicated the generation and/or combustion of hydrogen. The basis for the statements in the Mailgram are outlined in Licensee's response for TMIA's First Set of Interrogatories, numbers 54, 55, 56 and 58.

Interrogatory 20.

Identify all data which Mr. Lentz collected in the TMI-2 control room on March 28, 1979. Identify all information which Mr. Lenz subsequently communicated to licensee personnel in the Observation Center/Visitors' Center on March 28, 1979, and the reason or purpose for communicating such information. Specifically address whether Mr. Lentz communicated any of the information he collected to the following persons:

- (a) James Moore;
- (b) E. Wallace;
- (c) Robert Arnold;
- (d) Robert Keaton.

State whether or not any person identified above transmitted any of this information to Mr. Dieckamp.

Response 20.

General Objection 1. Today, Mr. Lentz recalls making copies of pages from the computer alarm printer and other plant data. The information copied, to his recollection, was for the period shortly before 0400 and for several hours thereafter. Mr. Lentz states that he did not have any knowledge on March 28, 1979 of the pressure spike, containment spray actuation or generation and subsequent combustion of hydrogen at about 1350 on March 28, 1979, and, therefore, did not communicate any information relative thereto to Messrs. Moore, Wallace, Arnold or Keaten on that day. These four individuals

likewise recall no such discussion or other communications with Mr. Lentz on March 28, 1979.

Mr. Dieckamp is not aware that Mr. Lentz was the source of any information which he received on March 28, 1979.

Interrogatory 21.

Identify all documents which recorded or memorialized the information which Mr. Lentz collected, including any data of records from the TMI-2 Control Room which he photocopied on March 28, 1979.

Response 21.

Data collected by Richard Lentz on March 28, 1979 was used by T. Gary Broughton on that day in preparing two graphs. The graphs are not titled, but will be made available in the Discovery Room in a folder identified under this interrogatory.

Interrogatory 22.

Identify the position and all duties and responsibilities of Richard Bensel on March 28, 1979. Identify all activities including any reporting activities of Mr. Bensel on March 28, 1979, concerning the TMI-2 accident.

Response 22.

General Objection 3 is applicable in that Richard Bensel has been deposed by TMIA.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

Ernest L. Blake, Jr.

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

Dated: October 9, 1984

October 9, 1984

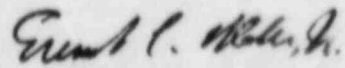
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Answers to Intervenor Three Mile Island Alert's Fourth Set of Interrogatories to General Public Utilities," dated October 9, 1984, were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 9th day of October, 1984.



Ernest L. Blake, Jr., P.C.

Dated: October 9, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-289 SP
)	(Restart Remand on Management)
(Three Mile Island Nuclear)	
Station, Unit No. 1))	

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