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October 15, 1984

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Dear Ellyn:

By letter dated September 26, 1984, Licensee agreed to provide to UCS supplemental responses to specified interrogatories contained in Union of Concerned Scientists' First Set of Interrogatories to General Public Utilities, dated August 28, 1984. By letter from Licensee's counsel to counsel for UCS dated September 28, 1984, Licensee provided a partial supplemental response to UCS' First Set of Interrogatories. This supplemental response constitutes the completion by Licensee of its commitments, as specified in my letter of September 26.

Interrogatories 2(d) and 2(f). Counsel for Licensee currently anticipates that its witnesses may rely on the following documents in forming the opinions contained in their testimony. To the extent UCS seeks documents other than those affirmatively relied on by Licensee's witnesses, its request unreasonably invades the work product and trial preparation exceptions to discovery specified in 10 C.F.R. § 2.740(b)(2).

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All Witnesses:

1. ALAB-772 (or applicable portions thereof, see answer to Interrogatory 2(g), below)
2. LBP-81-32 (or applicable portions thereof, see answer to Interrogatory 2(g), below)
3. LBP-82-56 (or applicable portions thereof, see answer to Interrogatory 2(g), below)
4. Special Report (or applicable portions thereof, see answer to Interrogatory 2(g), below)

Dr. Christensen

1. ATCC Training Summary
2. ATOG Control Room Walk-Through Program
3. Behavioral Training Objectives for Plant Simulation at TMI," Knief et al., 139 Trans. Amer. Nuc. Soc. 283 (1981)
4. TMI-1 BPT Systems document list

Dr. Gardner

1. Licensed Operator Training Program Descriptions
2. Instructor Development Program draft
3. Operator Training Instructor Indoctrination/Qualification Training Program Description
4. TMI Training Department Instructor Evaluation Procedure
5. Procedures on Control of Examinations (corporate and operator training)
6. Leonard Memo of Jan. 27, 1984
7. Licensee's response to RHR Report (Dec. 16, 1983)
8. Recent licensed operator exams

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Mr. Kelly

1. Instructor Development Program draft
2. TMI Training Department Instructor Evaluation Procedure
3. Operator Training Instructor  
Indoctrination/Qualification Program Description
4. Licensee's response to RHR Report (Dec. 16, 1983)
5. Licensed Operator Training Program Descriptions
6. Recent licensed operator exams
7. TMI-1 BPT Systems document list

Dr. Kimel

1. Licensed Operator Training Program Descriptions
2. GPUN Training & Education Advisory Council Charter
3. ATOG Training Summary
4. Integrity of Training and Testing (presentation to Board of Directors by P. R. Clark, July 12, 1984)
5. Statement of GPU to NRC in response to NRC's Aug. 6, 1984 Notice, Aug. 15, 1984
6. Resumes of training managers

Dr. Uhrig

1. Resumes of training managers
2. Kuhns statement before Subcommittee on Energy Research and Production, May 22, 1984
3. Statement of GPU to NRC in response to NRC's Aug. 6, 1984 Notice, Aug. 15, 1984
4. Integrity of Training and Testing (presentation to Board of Directors by P. R. Clark, July 12, 1984)
5. Rickover Report
6. Rickover Followup Report

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7. Looking Beyond the Lessons: A Utility Manager's Perspective, article by P. Clark, April 1984

Dr. Long and Dr. Coe:

1. INPO Evaluation (5/83)
2. Resumes of Training Managers
3. Licensed Operator instructor resumes
4. Integrity of Training and Testing (presentation to Board of Directors by P. R. Clark 7/12/84)
5. Statement of GPU to NRC in Response to NRC Notice of August 6, 1984, Aug. 15, 1984
6. GPUN Training and Education Advisory Council Charter
7. TMI licensed operator training program descriptions
8. NUREG-0680, Supp. No. 5 (relevant portions)
9. SALP (April, 1984)
10. GPUN Instructor Development Program (draft)
11. TMI Training Dept. Instructor Evaluation Procedure
12. Operator Training Instructor Indoctrination/ Qualification Training Program Description
13. Exam Control Procedures
14. Status Report of Licensee's response to RHR Report
15. ATOG Training Summary
16. Statement of Mr. Kuhns before the House Subcommittee on Energy Research and Production, May 22, 1984
17. Looking Beyond the Lessons: A Utility Manager's Perspective, article by P. R. Clark, April 1984
18. Rickover Report
19. Rickover Follow-up Report

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Mr. Newton, Mr. Leonard, and Mr. Ross:

1. INPO Evaluation (5/83)
2. Licensed Operator instructor resumes
3. Integrity of Training and Testing (presentation to Board of Directors by P. R. Clark 7/12/84)
4. Statement of GPU to NRC in Response to NRC Notice of August 6, 1984, Aug. 15, 1984
5. GPUN Training and Education Advisory Council Charter
6. TMI licensed operator training program descriptions
7. NUREG-0680, Supp. No. 5 (relevant portions)
8. SALP (April, 1984)
9. GPUN Instructor Development Program (draft)
10. TMI Training Dept. Instructor Evaluation Procedure
11. Operator Training Instructor Indoctrination/ Qualification Training Program Description
12. Exam Control Procedures
13. Status Report of Licensee's response to RHR Report
14. ATOG Training Summary
15. Rickover Report
16. Rickover Follow-up Report
17. Leonard Memo of Jan. 27, 1984
18. INPO Self-Evaluation Report (relevant portions)

Licensee's witnesses are now in the process of preparing their testimony; to date, the following consultations have occurred and will be relied on by the witnesses in their respective testimonies:

- (1) Dr. Coe and Dr. Long have conferred;
- (2) Mr. Newton, Mr. Leonard and Mr. Ross have conferred;



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(3) The Committee has discussed their forthcoming testimony with each other, with Dr. Coe, and with Mr. Leonard. In addition, Mr. Kelly and Dr. Christensen have visited the B&W simulator and the BPTS; Mr. Kelly and Dr. Gardner have conferred with operators attending classes at TMI; and counsel anticipates that Dr. Uhrig and Dr. Kimel will confer with members of Licensee's management prior to testifying, and that Dr. Gardner and Mr. Kelly may attend portions of an instructor development course.

Interrogatory 2(g). Licensee's counsel anticipates that the following topics will be covered in the testimony of each of its witnesses:

Dr. Long and Dr. Coe:

- (1) management's responsibility for cheating;
- (2) management's response to cheating;
- (3) the adequacy of the current managers responsible for the licensed operator training program;
- (4) the standards for licensed operator instructor qualification and their implementation at TMI; and
- (5) licensed operator training program goals.

Mr. Newton, Mr. Leonard and Mr. Ross:

- (1) the current TMI-1 licensed operator training program;
- (2) the current TMI-1 licensed operator training department;
- (3) training facilities;
- (4) operators' attitudes about licensed operator training; and
- (5) the INPO accreditation process.

The Reconstituted OARP Committee:

- (1) the Special Report;
- (2) the Committee's current views of the TMI-1 licensed operator training program.

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Licensee is not now sure whether its two panels of GPU Nuclear witnesses will subdivide sponsorship of the topics within their respective pieces of testimony. Obviously, there are certain subjects which one witness, from his experience and responsibilities, may be most suited to address. With respect to the Reconstituted OARP Committee, who will appear as a panel, Licensee anticipates that each of the five members of the Committee will be particularly knowledgeable in the following subject-areas:

Dr. Christensen -- the various aspects of simulator training.

Dr. Gardner -- the educational quality of the licensed operator training program and operators' views of training;

Mr. Kelly -- the substantive quality of the licensed operator training program and operators' views of training;

Dr. Kimel -- the substantive quality of the licensed operator training program, training management and GPU Nuclear's response to cheating (insofar as it relates to the licensed operator training program); and

Dr. Uhrig -- training management and GPU Nuclear's response to cheating (insofar as it relates to the licensed operator training program).

In this letter, Licensee has endeavored to be as fully forthcoming as possible, recognizing that its trial preparations currently are underway. The above information should enable UCS to understand and respond to Licensee's case-in-chief. As indicated in Licensee's Motion to Compel, which will be filed tomorrow, Licensee does not believe that UCS has been equally forthcoming with Licensee.

Sincerely,

*Deborah B. Bauser*

Deborah B. Bauser

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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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