

August 16, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONDOCKETED
USNRCBEFORE THE ATOMIC SAFETY AND LICENSING BOARD 7 P3:25

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
Docket No. 50-289 SP
(Restart-Management Remand)

LICENSEE'S FIRST SET OF INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO TMIA

Pursuant to 10 C.F.R. §§ 2.740b and 2.741 and to the Atomic Safety and Licensing Board's "Memorandum and Order Following Prehearing Conference" of July 9, 1984, Licensee hereby requests that intervenor Three Mile Island Alert (TMIA) answer separately and fully in writing, and under oath or affirmation, each of the following interrogatories, and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to these interrogatories. Licensee makes this request of TMIA in its capacity as a lead intervenor on the issue of training. Licensee has tried to limit its interrogatories of TMIA to those areas of training in which TMIA has asserted an interest. Licensee assumes that TMIA's response will reflect the collective knowledge of any intervenor who has an interest in, or desires to participate, in the areas of training in which TMIA intends to assume lead

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intervenor responsibilities. If Licensee is incorrect in its assumption, TMIA should promptly inform Licensee so that appropriate discovery requests can be provided to other intervenors as well.

Licensee's interrogatories are intended to be continuing in nature, and the answers should promptly be supplemented or amended as appropriate, pursuant to 10 C.F.R. § 2.740(e), should TMIA or any individual acting on its behalf obtain any new or differing responsive information. The request for production of documents is also continuing in nature and TMIA must produce immediately any additional documents it, or any individual acting on its behalf, obtains which are responsive to the request, in accordance with the provisions of 10 C.F.R. § 2.740(e).

As used hereinafter, "document(s)" mean all writings and records of every type in the possession, control or custody of TMIA or any individual acting on its behalf, including, but not limited to, memoranda, correspondence, bulletins, minutes, notes, speeches, articles, transcripts, testimony, voice recordings and all other writings or recordings of any kind; "document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of TMIA. Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum) and provide the following information, as applicable: document name, title, number, author, date of publication

and publisher, addressee, date written or approved, and the name and address of the person or persons having possession of the document. Also identify the specific portion or portions of the document (i.e., pages) upon which TMIA relies.

GENERAL INTERROGATORIES

T-1(a). State the name, present or last known address, and present or last employer of each person, other than affiant, who provided information upon which TMIA relied in answering each interrogatory herein.

(b). Identify all such information which was provided by each such person and the specific interrogatory response in which such information is contained.

T-2(a). Identify all documents upon which you relied in answering each interrogatory herein.

(b). Identify the specific interrogatory response(s) to which each such document relates.

T-3(a). Identify any other source of information, not previously identified in response to Interrogatories T-1 or T-2, which was used in answering the interrogatories set forth herein.

(b). Identify the specific interrogatory response(s) to which each such source of information relates.

INTERROGATORIES ON TRAINING

T-4. Identify the specific concerns TMIA has about the adequacy of the licensed operator training program at TMI.

T-5. Identify the basis for each of the concerns identified in response to Interrogatory T-4.

T-6. Identify the remedy that TMIA considers appropriate to respond to each of the concerns identified in response to Interrogatory T-4.

T-7. Does TMIA consider memorization an inappropriate learning technique? If so, explain why. If not, explain the basis on which you would assess whether memorization is being used as an effective learning technique.

T-8. How would TMIA determine what training is necessary to ensure that operators are able to run the plant?

T-9. Identify the specific subject-area(s) in Licensee's licensed operator training program, if any, that TMIA believes require enhancement.

T-10. For each subject-area identified in response to Interrogatory T-9, explain the basis for TMIA's view that training in that area should be enhanced.

T-11. Explain how, in TMIA's view, each of the subjects identified in response to Interrogatory T-9 should be enhanced.

T-12. In TMIA's view, does the format of Licensee's exams encourage cheating? Provide the basis for your answer.

T-13. Identify the standard on which TMIA relies to determine whether the format of Licensee's exams encourage cheating.

T-14. Identify every individual who, in view of the evidence in the reopened proceeding, TMIA believes is not qualified to serve in his current position in GPU Nuclear Corporation.

T-15. For every individual identified in response to Interrogatory T-14, explain the basis for TMIA's view that the individual is not qualified to serve in his current position in GPU Nuclear Corporation.

T-16. Is TMIA satisfied with Licensee's criteria for training instructors? If not, identify each of the bases for its dissatisfaction.

T-17. Does TMIA believe licensed operators should be required to spend additional time at the simulator? If so, explain the basis for your answer.

T-18. Does TMIA believe licensed operators should be tested on the simulator? If so, explain the basis for your answer.

T-19. In TMIA's view, has GPU properly responded to the problems in its training program identified internally and/or by the Special Master, the Licensing Board and the Appeal Board? If not, identify (a) each of the problems to which Licensee has not properly responded, in TMIA's view; and (b) the proper response to each identified problem.

T-20. What problems, if any, does TMIA perceive with the licensed operators' attitude toward the training program?

T-21. Identify any documents or individuals on which you rely in formulating your response to Interrogatory T-20.

T-22. Describe the appropriate attitude towards training that TMIA believes the TMI-1 operators should have.

T-23. What steps should Licensee take in response to the problems enumerated in response to Interrogatory T-20?

T-24. Is TMIA satisfied that Licensee's employees responsible for the management and implementation of the training program are properly equipped by their experience and attitude to impart the information and values necessary for safe operation of TMI-1? If not, identify (a) the employees about whom TMIA is dissatisfied; (b) each of the bases for its dissatisfaction; and (c) how TMIA would resolve its concern about each employee identified in response to Interrogatory T-24(a).

T-25. Identify the concerns TMIA has about the TMI licensed operator training program, if any, based on its review of the RHR Report.

T-26. Identify each specific portion (i.e., particular page(s) and particular statement(s)) of the RHR Report on which TMIA relies in formulating its response to Interrogatory T-25.

T-27. Identify the concerns TMIA has about the TMI licensed operator training program, if any, based on its review of the BETA Report.

T-28. Identify each specific portion (i.e., particular page(s) and particular statement(s)) of the BETA Report on which TMIA relies in formulating its response to Interrogatory T-27.

T-29. Identify any criticisms TMIA has of the Special Report of the Reconstituted OARP Review Committee, dated June 12, 1984.

T-30. Identify each specific portion (i.e., particular page(s) and particular statement(s)) of the Special Report of the Reconstituted OARP Review Committee on which TMIA relies in formulating its response to Interrogatory T-29.

Respectfully submitted,

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Dated: August 16, 1984

August 16, 1984

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's First Set of Interrogatories and First Request for Production of Documents to TMIA" were served this 16th day of August, 1984, by hand delivery to the parties identified with an asterisk and by deposit in the U.S. mail, first class, postage prepaid, to the other parties on the attached Service List.

Deborah B. Bauser

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NUCLEAR REGULATORY COMMISSION

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