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TESTIMONY OF JAMES R. SPANG
OF THE NUCLEAR REGULATORY
COMMISSION

AMERICAN SOCIETY OF UTILITY INVESTORS

PRESENTED TO THE

NUCLEAR REGULATORY COMMISSION

BY

JAMES R. SPANG, PRESIDENT

American Society of Utility Investors
P. O. Box 342
New Cumberland, PA 17070
(717) 774-2556

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PDR ADOCK 05000289
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MANAGEMENT INTEGRITY

Five years of charges, investigations, hearings and inspections of the Three Mile Island nuclear facility and its operating and management personnel have proven relatively non-productive in the uncovering of management wrongdoing and/or incompetence. Indeed, with the exception of the media's penchant for highlighting trivia, the exact opposite has occurred. Time-after-time, in response to what seems to be never ending charges, competent investigators have had to conclude that management integrity meets every reasonable standard that has been devised for its assessment.

But, can "reasonable standards" be devised for assessment? Even if so-called "management" had not been found "competent" after so-called expert review and study, vague terms such as "management" and "integrity" are simply not capable of definitive analysis. Let me explain. A term is said to be vague if there are cases in which there is no definite answer as to whether the term applies. For example, even if we accept the term "management" in terms of function, the word is still vague in the sense that we are not sure who or what positions should be included. Clearly, the Chief Executive Officer of GPU and GPU Nuclear are included in the term, and perhaps one or two vice presidents and maybe the plant manager. Still, the vice presidents, and perhaps even more so in the case of the plant manager, are restricted in their freedom of action to the degree that their supervisor has elected not to confer all of his responsibility and authority. Does this mean that the management investigation issue should be restricted to the CEO of GPU and GPU Nuclear. I suspect most people would include some additional positions. But, what positions? Should the operating control room supervisor, or the operators themselves be included? In a very real way, the operators are "managing" the plant when they are monitoring a computer terminal, throwing a switch or twisting a knob. And, what about high level supportive areas? Should we include the Vice President for Communications? If someone says "We must investigate management integrity," in response to a charge

of operators cheating on a qualifying examination, does this include the Vice President for Communications? Or, should we restrict our examination to those "management" positions involved with the immediate health and safety of the plant workers and community at large? And what do the words "health and safety" mean? How much health, and what is safe? If we accept it at all, perhaps the latter qualification would permit us to restrict our focus to those personnel directly involved with the operation of the plant. On the other hand, what if the Vice President for Communications were to write and release a favorable operational report when plant conditions were not favorable? Or what if the manager of plant maintenance (another peripheral area) failed to test and service the area alarm system and an accident should occur? In short, who or what is management? And once we have answered that question, and assuming it has something to do with people performing a special function called "management," should all be involved? If all should be involved, are there varying levels of involvement? What assessment criteria need to be developed for which level of managers? Of course, questions of this kind can be multiplied indefinitely. The point is, it's not that we don't know the meaning of the term "management" in a general way, it's simply that the word defies precision and we don't know whether to apply it in any specific instance in a meaningful way.

So . . . , who or what are we taking about when we use the term "management"? Is the term to be applied to all of the above, none of the above or some of the above? If all the above, can we take it seriously as a prescription for anything? Understandably, when questioned about the unfamiliar, people often respond with a statement such as "That's a very vague term" or "Can't you be less vague?" The main difficulty here, in our analysis of the words "management" and "integrity," is not the inherent vagueness of the term "management," or "integrity," but the lack of specificity in the use of the terms. On the other hand, there may be good reason not to be specific. Specificity, often as not, may only serve to cloud an issue. Then again, imposed specificity might engender severe criticism for being

an arbitrary or capricious definition; or, it may simply not be able to withstand specificity without looking foolish. Of course, any vagueness inherent in the term "management" is likely to be equally applicable to the "clarifying" definitions.

The word "integrity" is even more vague than the term "management." It has the further weakness of being an evaluative word. Ludwig Wittgenstein in his now famous pioneer treatise, "Philosophical Investigations," Oxford: B. Blackwell, 1953, questioned whether any evaluative word has any meaning whatsoever except on a totally unsatisfactory level of comprehension. Words such as "know," "good," "free," "see," "true," while loaded with emotional appeal, may have little or no meaning. In that sense they are nonsense, or literally "no sense." For example, if we say "He knows!," our natural question would immediately be, "Knows what?" And what does it mean to "know?" Or, use the phrase, "He is good." Good in what? And what do we mean by good? The same failure surrounds the word "integrity." What is it? How do we know when we have it? Is an act of "integrity" or a hundred of acts of "integrity" sufficient to pronounce us as having "integrity"? And suppose the hundred acts are relatively minor. Does it make any difference? And suppose we are found wanting in a single act of integrity. Should we be pronounced as having no integrity? Or, would we be said to have some integrity, but not all integrity?

It is questions of this sort that keep coming to mind that casts a cloud on the efficacy of the entire process. In the final analysis, we can only conclude that nothing more can possibly be accomplished by further delay.

In terms of hardware, TMI #1 is ready to go. This fact can be determined in a physical sense. The operators have passed challenge examinations. The organization of the company has been restructured.

I would simply close by saying "Gentlemen, do your duty."