

457

August 28, 1984

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
METROPOLITAN EDISON COMPANY) '84 AGO 30 F12:25
(Three Mile Island Nuclear) Docket No. 50-289 SP
Station, Unit No. 1) (Restart - Management Phase)

UNION OF CONCERNED SCIENTISTS FIRST REQUEST TO
GENERAL PUBLIC UTILITIES FOR PRODUCTION OF DOCUMENTS

TO: GENERAL PUBLIC UTILITIES NUCLEAR CORPORATION

Pursuant to 10 C.F.R. 2.741, the Union of Concerned Scientists hereby requests General Public Utilities Nuclear Corporation ("GPU") to produce and make available for inspection and copying, each document in the possession or custody of GPU or subject to the control of GPU or its agents and attorneys, as requested below.

DEFINITIONS

(a) The Nuclear Regulatory Commission or "NRC" shall mean the Nuclear Regulatory Commission, its branches, departments, sections, offices, subdivisions, its present and former commissioners, administrators, management, employees, staff, agents, representatives, consultants, officials, inspectors, investigators, auditors and accountants, attorneys or their agents, attorneys or representatives.

DS03

(b) "General Public Utilities" or "GPU" shall mean General Public Utilities, any of its subsidiaries, including but not limited to GPU Nuclear Corporation and Metropolitan Edison Company, and its subsidiaries' branches, divisions, departments, sections, affiliates, offices, present and former officers, directors, management, board of directors, employees, staff, officials, agents, consultants, attorneys representatives and their attorneys, representatives and agents.

(c) "Document" shall mean every writing of every type or description, and every other instrument or device by which, through which or on which information has been recorded and/or preserved, including but not limited to memoranda, notes, letters, drawings, files, graphs, charts, photographs, slide presentations, handwritten notes, logs, ledgers, studies, data sheets, appointment calendars, telephone messages, meeting minutes, calculations, computations, financial statements, voice recordings and other data compilations or every other device or media on which or through which information of any type is transmitted, recorded or preserved.

(d). "Person" shall refer to any natural person, firm, partnership, joint venture, trust, corporation, holding company or other entity, natural or legal, domestic or foreign.

(e) "Communication: shall mean discussion, conversation, letter, memorandum, telephone call, message or direction, whether written or oral or whether in person, by telephone or by mail.

(f) "Special Report" shall mean the Special Report or the Reconstituted OARP Review Committee, dated June 12, 1984.

INSTRUCTIONS FOR USE

A. You must make available for inspection or copying all documents that are in your possession or under your control, or in the possession or under the control of your officers, management, executives, employees, staff, directors, officials, attorneys, consultants, accountants, inspectors, investigators, or representatives, or their agents, representatives or attorneys.

B. If GPU contends that any document responsive to any request for production listed below is privileged in whole or in part, or otherwise objects to any part of any request, state the reason for each objection or grounds for exclusion, and identify each person having knowledge of the factual basis, if any, on which the privilege or other ground is asserted.

C. If any document responsive to any request for production is no longer in existence, then answer the following questions:

(1) identify what information was maintained in that document;

(2) identify the type of document which contained such information;

(3) state the time period during which such document was maintained;

(4) state the circumstances under which such document ceased to exist;

(5) state the date when such document ceased to exist;

(6) identify all persons having knowledge of the circumstances under which such document ceased to exist; and

(7) identify all persons who have knowledge or had knowledge of the document and the contents thereof.

This Request for Production is deemed to be continuing such that GPU is requested to supplement production with all responsive documents which come into its possession, custody or control subsequent to production of documents pursuant to intervenor's request.

NOTE ON NONDUPLICATION

UCS has attempted to avoid duplication of document requests made by other intervenors. Should such duplication occur despite our efforts, you may identify the duplicative document request and the documents that you have provided in response to another intervenor's document request that you believe are responsive to UCS' document request. Should UCS' document request be broader than the other intervenor's, you must provide the additional documents as well as identifying those that you have already provided.

DOCUMENTS REQUESTED

1. All documents identified pursuant to Interrogatory Nos. 2(c) (testimony), 2(e), 2(f), and 8(d) in UCS' First Set of Interrogatories to GPU.
2. All operator examinations given under the C-REP program or otherwise given since March 28, 1979, for the purpose of evaluating candidates for Reactor Operator or Senior Reactor Operator or for the purpose of evaluating candidates for requalification for those positions. For each such examination, provide the following:

- a. The examination as given to the candidates.
- b. The answer key.
- c. All graded answers to the examination.
- d. All documents used in the development of the examination.
- e. All documents reflecting an evaluation or opinion as to the effectiveness of the examination for its intended purpose.
- f. All documents related to the results of the examination, including, but not limited to documents evaluating the performance of individual candidates on or in light of the examination, and documents comparing or considering the results of this examination in connection with the results of one or more other examinations.

3. The current versions of the following operating or emergency procedures (and the equivalent in ATOG procedures if GPU has adopted ATOG procedures in the particular case):

a. Emergency Procedures

1202-2 Station Blackout

1202-4 Reactor Trip

1202-5 OTSG Tube Leak/Rupture

1202-6A Loss of Reactor Coolant

Pressure within Capability of

Makeup System (RC Pressure above ESAS setpoint)

- 1202-6B Loss of Reactor Coolant/Reactor Coolant
Pressure (Small Break LOCA)
Causing Automatic High Pressure Injection
- 1202-6C Loss of Reactor Coolant/Reactor Coolant
Pressure Causing Automatic High Pressure
Injection, Core Flood and Low Pressure
Injection.
- 1202-26A Loss of Steam Generator Feed to both OTSG's.
- 1202-29 "Pressurizer System Failure"
- 1202-39 Inadequate Core Cooling

b. Operating Procedures

- 1102-11 Plant Cooldown
- 1102-16 RCS Natural Circulation Cooling

4. All lesson plans, teaching materials, and study materials used since March 28, 1979, with respect to the following:

- a. The subjects covered by the procedures identified in Document Request No. 3.
- b. Use of the Emergency Feed Water (EFW) System.
- c. The condensate and main feed water systems under emergency conditions.

d. High pressure injection.

e. Low pressure invecton.

(Note: May overlap with request No. 17 in TMIA's Second Request for Production).

5. Documents Numbered 6,7,8,9, and 11 on Table A-Z of the Special Report. (May overlap with Request No. 30 of TMIA's Second Request for Production).

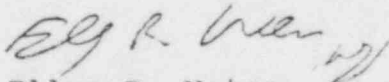
6. All Drafts and manuscripts of the Special Report.

7. The Documents Referred to in the paragraphs number 1-4 on pages 20-21 of the Special Report. (May overlap with Request No. 3 in TMIA's Second Request for Production).

8. The "Detailed Rating Sheet" discussed at page 21 of the Special Report.

9. All documents establishing or referring to "the scenarios required by NRR (the so-called 'Denton Requirements')," discussed at page 60 of the Special Report.

Respectfully submitted,


Ellyn R. Weiss


William S. Jordan, III

Harmon, Weiss, & Jordan
2001 S Street, N.W.
Suite 430
Washington, D.C. 20009

Date: August 28, 1984

Counsel for Union of Concerned
Scientists