

148  
RELATED CORRESPONDENCE

DOCKETED  
September 28, 1984  
84 OCT -1 P12:18  
OFFICE OF THE SECRETARY  
NUCLEAR REGULATORY COMMISSION  
SEARCH

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 SP
	)	(Restart-Management Remand)
(Three Mile Island Nuclear	)	
Station, Unit No. 1)	)	

LICENSEE'S ANSWERS TO INTERVENOR UNION OF CONCERNED  
SCIENTISTS' FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS TO GENERAL PUBLIC UTILITIES

Licensee General Public Utilities Nuclear Corporation (GPU Nuclear), pursuant to 10 C.F.R. § 2.741(d), hereby submits the following responses to "Union of Concerned Scientists First Request to General Public Utilities for Production of Documents." Documents will be made available in the discovery reading room located at the offices of Shaw, Pittman, Potts & Trowbridge, 1800 M Street, N.W., Washington, D.C. 20036.

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.

RESPONSE AND OBJECTION. Licensee will respond to the UCS Interrogatory 2(c) as specified in its agreement with UCS, memorialized by letter dated September 26, 1984, which contemplated that UCS would be given information available to Licensee's witnesses about their previous testimony so that UCS could

retrieve the information. Insofar as UCS would require Licensee to go through this effort for UCS, Licensee objects to UCS discovery request 1. Licensee will provide in the discovery reading room a copy of documents referred to in its future supplemental response to UCS Interrogatory 2(f). Documents listed in response to UCS Interrogatory 8(d) are available in the discovery reading room in response to UCS (first set) Interrogatory 3.

2. All operator examinations given under the OAR<sup>1</sup> 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.

RESPONSE. Those documents included in the agreement between the parties, set forth in the September 11, 1984 letter from counsel for UCS to counsel for Licensee, will be provided in the discovery reading room.

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)
- 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

RESPONSE. Documents will be provided in the discovery reading room.

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 invective.

RESPONSE. Those documents included in the agreement between the parties, set forth in the September 11, 1984 letter from counsel for UCS to counsel for Licensee, will be provided in the discovery reading room.

5. Documents Numbered 6,7,8,9, and 11 on Table A-2 of the Special Report.

RESPONSE. These documents are available in the discovery reading room in response to TMIA (first set) document production request 2.

6. All drafts and manuscripts of the Special Report.

RESPONSE. These documents are available in the discovery reading room in response to TMIA (first set) document production request 1.

7. The Documents referred to in the paragraphs number 1-4 on pages 20-21 of the Special Report.

RESPONSE. The document, Operator Training Instructor Indoctrination/Qualification, is document #4 provided in response to TMIA (first set) document production request 2. The document, GPUN Instructor Development Program, is document #30 provided in response to TMIA (first set) document production request 2. The document, Training Systems Development, is document #21 provided in response to TMIA (first set) document production request 2. The document, TMI Training Department Instructor Evaluation Procedure, is document #31 provided in response to TMIA (first set) document production request 2.

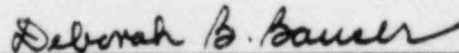
8. The "Detailed Rating Sheet" discussed at page 21 of the Special Report.

RESPONSE. Document will be provided in the discovery reading room.

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.

RESPONSE. Documents will be provided in the discovery reading room.

Respectfully submitted,



---

Ernest L. Blake, Jr., P.C.  
Deborah B. Bauser  
SHAW, PITTMAN, POTTS & TROWBRIDGE  
1800 M Street, N.W.  
Washington, D.C. 20036  
(202) 822-1215

Counsel for Licensee

Dated: September 28, 1984