SUMMARY OF TESTIMONY

BEFORE

THE PRESIDENT'S COMMISSION ON THE ACCIDENT AT THREE MILE ISLAND

> BY JOHN G. HERBEIN VICE PRESIDENT-GEL.PATION METROPOLITAN EDISON COMPANY

May 18, 1979 679 277 58 7907180037 ~

My name is John G. Herbein. I am Vice President-Generation for Metropolitan Edison Company. My testimony describes the Generation Department of Met-Ed and the Three Mile Island organization as it existed at the time of the accident at TMI-2 on March 28, 1979.

As Met-Ed Vice President-Generation, I am responsible for the operation, maintenance, administration, quality assurance, and related technical engineering support activities associated with the generating stations owned and operated by Met-Ed.

Reporting to me as Vice President-Generation are six managers. Their areas of responsibility are Generation Operations, Generation Maintenance, Generation Quality Assurance, Generation Administration, Generation Engineering and Generating Station Nuclear Operations.

The Three Mile Island Nuclear Generating Station is managed through an organization headed by the Manager-Generating Station-Nuclear.

Reporting directly to the Manager-Generating Station-Nuclear are the Unit Superintendents-Nuclear for TMI Unit 1 and TMI Unit 2, the Superintendent-Maintenance-Nuclear, and the Superintendent-Administration/Technical Support-Nuclear.

The Station Manager, along with the four Superintendents comprise the senior management station staff and are collectively responsible for operation, surveillance, maintenance, repair, refueling and administration, as well as the small scale construction of new systems, the modification of existing systems, and the radiation protection and chemistry of the Station.

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The Unit Superintendent is responsible directly to the Manager-Generating Station-Nuclear for day to day unit operations and the required maintenance and on site Technical Support.

The Supervisor-Station Operations-Nuclear who reports to the Unit Superintendent directs the work activities of the Operations Department. Operations Department employees at TMI are assigned to a six shift rotating schedule. Each shift assigned to a single unit is typically composed of one (1) Shift Foreman-Nuclear, three (3) Control Room Operators-Nuclear, and seven (7) Auxiliary Operators. The Shift Foreman-Nuclear, assigned to a specific unit, reports to the Shift Supervisor-Nuclear who is responsible on a shift basis for both units.

Each Shift Supervisor has a Senior Reactor Operator's license on both units and each Shift Foreman has a Senior Reactor Operator's license on the Unit to which he is assigned. Control Room Operators, after a 9 to 12 month training program, and extensive Company and NRC exams qualify for a Reactor Operator's license on the Unit to which they are assigned.

The number of employees with Senior Reactor Operator Licenses on both units is 12. The number of employees with Senior Reactor Operator Licenses on Unit 1 is 12, the number of employees with Senior Reactor Operator Licenses on Unit 2 is 7, the number of employees with Reactor Operator Licenses on Unit 1 is 11, and the number of employees with Reactor Operator Licenses on Unit 1 is 11, and the number of employees with Reactor Operator Licenses on Unit 2 is 12. There are a total of 54 licenses held by TML employees.

679 279

- 2 -

The TMI Unit 2 Sechnical Specifications delineate the administrative control and organizational requirements of the Nuclear Regulatory Commission operating license for TMI=2. The on-site operating organization and the off-site technical support and management staff are composed to comply with these controls and regulations. The NRC license also prescribes two independent committees established to oversee plant operations and ensure compliance with safety requirements.

The first of these committees, the Plant Operations Review Committee (PORC), is required to advise the Unit Superintendent on all matters related to nuclear safety. The PORC is comprised of key individuals from the Unit Operations, Maintenance, Health Physics, Chemistry and Technical Support Groups. "",e PORC is responsible for initial review of all nuclear safety related procedures, security plan and emergency plan and procedures, and procedure changes thereto. The Committee is required to review all tests and experiments that affect nuclear safety. This review encompassed all initial Start-Up and test procedures and test results. The PORC is required to review all proposed changes of Technical Specifications. This Committee must also review proposed changes or modifications to any Unit Systems or components which may effect nuclear safety. PORC must also investigate violations of Technical Specifications and advise the Unit Superintendent as to their cause and possible corrective action.

The second committee, the Generation Review Committee, is organized to provide an independent review and audit of designated activities in the areas of nuclear unit operations, nuclear engineering, chemistry and radio chemistry, metallurgy, instrument and control, radiological safety, mechanical and electrical engineering and quality assurance practices. The Generation Review Committee reviews safety

679. 280

- 3 -

evaluations for changes to procedures, equipment or systems completed under the provisions of 10 CFR 50.59 to verify that such actions do not constitute an unreviewed safety question. The Generation Review Committe also reviews: proposed changes to the Technical Specifications; violations of codes, regulations, license requirements or internal procedures having nuclear safety significance; and minutes of the meetings held by Plant Operations Review Committee. Audits of Unit activities are required to be performed under the cognizance of Generation Review Committee. These audits must encompass conformance of the Unit's operations to provisions contained within the Technical Specifications, the training and qualifications of the Unit staff, the results of action takin to correct deficiencies occurring in Unit equipment where methods of operations are involved that could effect nuclear safety, the emergency plan, the security plan, and the fire protection plan. The Generation Review Group is required to report to and advise me as Vice President-Generation in all of these areas.

679 281

- 4 -