

RELATIVE TO THE MATTER OF



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  
 ) (Restart)  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

INTERROGATORIES OF INTERVENOR  
THREE MILE ISLAND ALERT, INC.  
TO LICENSEE

(FIRST SET)

Three Mile Island Alert, Inc., by its attorneys, Widoff, Reager, Selkowitz and Adler, P.C., hereby files the following interrogatories pursuant to 10 C.F.R., Section 2.740(b). These interrogatories are deemed to be continuing, and shall be supplemented by Licensee when and if additional or corrective information is obtained.

RADIATION - AIR (CONTENTION #1)

1. Has the Licensee monitored radioactive emissions from TMI-1 and TMI-2 into the air during the operation of these units?

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2. Are records maintained of the radioactive emissions into the air for the twelve months preceding the March 28, 1979 accident?

3. If so, state:

- (a) the name, address and telephone number of the person having custody of these records;
- (b) the name, address and telephone number of each person responsible for monitoring radioactive emissions from the plant into the air;
- (c) identify and make available copies of the records referred to in your answer to Interrogatory No. 2.

4. List every instance, if any, when a release of radiation into the air from TMI-1 exceeded permissible limits during the twelve months prior to the March 28, 1979 accident.

5. If the releases of radiation into the air exceeded permissible limits, state:

(a) the cause of the excess release;

(b) remedial measures taken;

(c) whether any fines or warnings were issued by the NRC.

6. Were there any radioactive releases into the air in excess of permissible limits as a result of the March 28, 1979 accident?

7. If so, state:

- (a) the amount of each release;
- (b) who measured the release;
- (c) if more than one person/governmental agency measured the release, list any discrepancies between the two measurements;
- (d) each measurement taken by Licensee from plane or helicopter, including the:
  - (i) time of the reading;
  - (ii) date of the reading;
  - (iii) location of the reading.

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8. What is the mathematical basis by which measured dose releases are converted to man-rems?

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RADIATION - WATER (CONTENTION #2)

9. Has the Licensee monitored radioactive emissions from TMI-1 and TMI-2 into the Susquehanna River during the operation of the two reactors?
10. Are records maintained of the radioactive emissions into the Susquehanna River for the twelve months preceding the March 28, 1979 accident?
11. If so, state:
  - (a) the name, address and telephone number of the person having custody of these records;
  - (b) the names, addresses and telephone numbers of those persons responsible for monitoring radioactive emissions from the plant into the Susquehanna River.
  - (c) identify and make available copies of the records referred to in your answer to Interrogatory No. 2.

12. List every instance, if any, when a release of radiation into the Susquehanna River from TMI-1 exceeded permissible limits during the twelve months prior to the March 28, 1979 accident.

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13. If the releases of radiation into the Susquehanna River exceeded permissible limits, state:

- (a) the cause of the excess release;
- (b) remedial measures taken;
- (c) whether any fines or warnings were issued by the NRC.

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14. Were there any radioactive releases into the Susquehanna River in excess of permissible limits as a result of the March 28, 1979 accident?

15. If so, state:

- (a) the amount of each release;
- (b) who measured the release;
- (c) if more than one person/governmental agency measured the release, list any discrepancies between the two measurements;
- (d) each measurement taken by Licensee from plane or helicopter, including the:
  - (i) time of the reading;
  - (ii) date of the reading;
  - (iii) location of the reading.

16. How are doses of radiation released calculated and converted to man-rems?

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SOCIO-ECONOMIC CONSEQUENCES (CONTENTION #3)

17. Identify and provide every piece of correspondence received by Licensee after the accident that expressed concern with or questioned the safety of reopening TMI-1 or TMI-2.

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18. As to the correspondence referred to in Interrogatory 17, separately identify and provide those that were received from:

- (a) individual women;
- (b) individual men;
- (c) husband and wife;
- (d) children between the ages of twelve and eighteen;
- (e) businesses;
- (f) associations;
- (g) medical doctors;
- (h) nuclear engineers;
- (i) nuclear physicists.

19. Identify and provide any studies or reports done for Licensee analyzing or recommending action with respect to:

- (a) the impact of the TMI-2 accident on the general population;
- (b) psychological impacts of the accident;
- (c) the credibility of Licensee with the general population residing near TMI-2, since the accident;
- (d) public relations in the wake of the TMI-2 accident.

SECURITY (CONTENTION #4)

20. Are the present security plans for TMI-1 and TMI-2 different? If so, describe in detail the distinctions between the two plans.

21. If there is a consolidated security plan for Three Mile Island, state:

(a) whether this plan has been altered since the TMI-2 accident, and, if so:

(i) describe the changes; and

(ii) state the reasons for each change.

(b) who prepared the consolidated security plan.

22. With respect to security, state:

(a) each breach of security that has occurred at TMI-1 and TMI-2 since they were opened, including:

(i) copies of reports submitted to Federal, State or local authorities describing the breach; and

(ii) remedial action, if any, taken after each such incident.

23. With respect to security, list the names, addresses and telephone numbers of all Met-Ed employees having responsibility for security.

24. List the names, addresses and telephone numbers of all outside consultants retained in the past or presently retained to advise Licensee on security matters.

MANAGEMENT (CONTENTION #5)

25. Has TMI-1 ever been shut down for maintenance or repair? If so, state:

- (a) each date TMI-1 was down;
- (b) the reasons therefor and whether the outage was scheduled or forced;
- (c) how long it was down and the work done during that period;
- (d) the types of reports filed concerning the work;
- (e) the name, address and telephone number of each person who had responsibility for preparing, approving or signing these reports.

26. Are there rules, regulations, guidelines, instructions or orders issued by Licensee to its employees concerning the maintenance and repair of TMI-1 and TMI-2?

27. If so, state:

- (a) whether such rules, regulations, guidelines, instructions or orders are written or oral;
- (b) if written, please provide copies of each and every document identified in (a);
- (c) the substance of each rule, regulation, guideline, instruction or order, if oral;
- (d) the name, address and telephone number of each person with the responsibility of informing each of Licensee's employees of each such rule, regulation, guideline, instruction or order;
- (e) the name, address and telephone number of each person with the responsibility of enforcing each such rule, regulation, guideline, instruction or order.

28. What is the name, address and telephone number of each of Licensee's employees having as his job duty, or as part of his job duties, the function of maintenance, repair or quality assurance for TMI-1 and TMI-2?

29. Are the employees of Licensee required to attend regularly scheduled meetings and seminars concerning the safe operation, maintenance and repair of TMI-1 and TMI-2?

30. If so, state:

- (a) the date on which the last such meeting was held prior to the March 28, 1979 accident;
- (b) the place at which the last such meeting was held;
- (c) the name, address and telephone number of each person in charge of the last meeting;
- (d) the nature of the topics discussed at the last such meeting;
- (e) the name, address and telephone number of each person having custody of any records, notices or memoranda concerning such meetings held within the year preceding the date of the March 28, 1979 accident;
- (f) identify and provide all such records, notices or memoranda.

31. Have any meetings or seminars been held by Licensee and its employees subsequent to the March 28, 1979 accident to discuss the causes of the March 28, 1979 accident and to recommend preventive or remedial measures?

32. If so, state:

- (a) the date and place of each meeting;
- (b) the name, address and telephone number of each person responsible for arranging the meeting;
- (c) the name, address and telephone number of each person attending such meetings;
- (d) the nature of the topics discussed at these meetings;
- (e) the name, address and telephone number of each person having custody of any records, notices or memoranda concerning such meetings;
- (f) identify and provide all such records, notices or memoranda concerning the meetings referred to in this interrogatory.

33. What is the name, address and telephone number known to you, or anyone acting on your behalf, of each person who has knowledge of, or complained of, maintenance or safety problems at TMI-1 and TMI-2?

34. Has the Licensee, or anyone acting on its behalf, obtained statements from any person regarding maintenance or safety problems at TMI-1 and TMI-2, or concerning the causes of the March 28, 1979 accident?

35. If so, state:

- (a) the name, address and telephone number of the person who took the statement;
- (b) the name, address and telephone number of the person who gave the statement;
- (c) provide copies of all such statements.

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36. Describe the procedure Licensee follows in determining what preventive or remedial maintenance or repair is to be done.

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37. Are work orders or similar forms used to identify a need for maintenance and/or repair and to authorize such work?

38. If so, state:

- (a) the organizational structure of the maintenance and safety operations of Licensee at TMI-1 and TMI-2, including the name, address and telephone number of each person listed on the organizational chart;
- (b) the name, address and telephone number of each person responsible for approving or disapproving work orders or the like for TMI-1 and TMI-2 during the twelve months preceding the March 28, 1979 accident;
- (c) the date of each work order or the like and the date the work was done;
- (d) provide copies of each work order or the like submitted for TMI-1 and TMI-2 for the eighteen months preceding the March 28, 1979 accident;
- (e) indicate for each work order or the like the date the work was found necessary, the date it was authorized, and the date it was actually done, if done;
- (f) indicate what repairs and/or maintenance, if any, were recommended to be done but not authorized or done;
- (g) for work actually done, provide the names, addresses and telephone numbers of those who performed the work and those who certified that the work was accomplished.

39. Do your records indicate the dates of NRC inspections of TMI-1 and TMI-2 for the period of eighteen months prior to the March 28, 1979 accident?

40. If so, please provide:

- (a) the dates of the inspections;
- (b) copies of all inspection reports in your possession;
- (c) copies of all correspondence or other material indicating what response, if any, was made.

FINANCIAL (CONTENTION #6)

41. Has the Licensee prepared, or had prepared, any analysis of its financial position as a result of the March 28, 1979 accident?

42. If so, state:

- (a) the name, address and telephone number of the person who prepared the analysis;
- (b) the nature and topics of the analysis;
- (c) identify and provide copies of all such analyses.

43. Has the Licensee had difficulties in obtaining short-term financing since March 28, 1979?

44. If so, state:

- (a) the nature of the difficulties;
- (b) the name, address and telephone number of each person who has been requested to provide short-term financing to Licensee;
- (c) the results of each request;
- (d) the present status of any short-term financing plans presently available to Licensee;
- (e) identify and provide copies of all short-term financing plans developed or implemented, including those that were unsuccessful.

45. What are the present plans of Licensee or its parent, GPU, with respect to long-term financing?

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46. Please provide copies of all analyses prepared by or for Licensee concerning the availability of long-term financing for Licensee.

47. Has Licensee or its parent, GPU, had prepared any studies or analyses regarding the potential impact if Licensee were to be unable to meet its debts and file for bankruptcy?

48. If so, state:

- (a) the name, address and telephone number of each person who prepared these studies;
- (b) the name, address and telephone number of each person who has custody of these studies;
- (c) identify and provide all such records, notices, reports, and memoranda dealing with these studies.

49. Since the March 28, 1979 accident, has the Licensee been unable to pay those debts which it normally paid out of current revenues prior to the March 28, 1979 accident?

50. If so, state:

- (a) each instance of indebtedness Licensee has been unable to pay out of current revenues;
- (b) how the Licensee has obtained funds necessary to meet these debts;
- (c) refinancings that Licensee has done since the March 28, 1979 accident.

SAFETY (CONTENTION #7)

51. Has the Licensee prepared, or had prepared, any studies or analyses as to whether the Licensee would be able to manage any accident at TMI-1 similar to that which occurred at TMI-2, while TMI-2 remains contaminated and radioactive wastewater is still being stored at TMI-2?

52. If so, state:

- (a) the name, address and telephone number of persons who prepared the studies or analyses;
- (b) the name, address and telephone number of each person who has custody of the raw data used to prepare the reports or studies;
- (c) provide copies of the reports.

53. Has the Licensee prepared, or had prepared, any studies or analyses concerning the decontamination of the damaged TMI-2 reactor?

54. If so, state:

(a) the name, address and telephone number of the person who prepared the studies or analyses;

(b) provide copies of each such study or analysis.

55. Has the Licensee chosen one of the plans to decontaminate TMI-2?

56. If so, state:

- (a) the name, address and telephone number of each person who took part in selecting the plan;
- (b) provide copies of all memoranda, correspondence and notes which deal with the selection of the plan.

57. If the plan selected by Licensee is not accepted by the NRC, does Licensee have alternative plans? If so, describe the plans.

CERTIFICATE OF SERVICE

I do hereby certify that I served a true and correct copy of the foregoing document on the below listed parties by first-class mailing:

Ivan W. Smith, Esquire  
Atomic Safety & Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

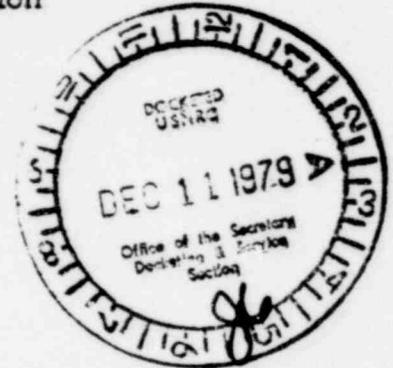
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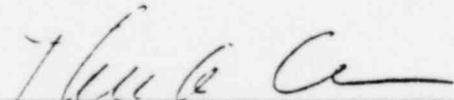
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Theodore A. Adler

Dated: December 6, 1979