

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

12/27/79

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
METROPOLITAN EDISON COMPANY, et al.) Docket No. 50-289
(Three Mile Island, Unit 1))

FIRST SET OF NRC STAFF
INTERROGATORIES TO INTERVENORS

Pursuant to 10 C.F.R. §2.740b, the following general interrogatories are directed to each party admitted in the above-captioned proceeding.^{1/} In addition, other specific interrogatories are directed to the Environmental Coalition on Nuclear Power (ECNP), Steven C. Sholly, and the Union of Concerned Scientists (UCS). Only the party to whom the questions are addressed are required to answer.

Each interrogatory not objected to is to be answered separately and fully in writing under oath or affirmation by the individuals having personal knowledge of the answers. The answers should be supplemented as required by §2.740(e). Please do not hesitate to supplement your responses to questions

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1/ The Atomic Safety and Licensing Board in its First Special Prehearing Conference Order dated December 18, 1979 admitted as parties to the proceeding the following: Union of Concerned Scientists (UCS); Three Mile Island Alert (TMIA); Mrs. Aamodt; Mr. Sholly; Anti-Nuclear Group Representing York (ANGRY); Environmental Coalition on Nuclear Power (ECNP); Chesapeake Energy Alliance (CEA); and Newberry Township TMI Steering Committee. The Board deferred ruling on the status of the People Against Nuclear Power (PANE), and admitted Mr. Lewis as a matter of discretion. In addition, the Commonwealth of Pennsylvania, the Pennsylvania Public Utility Commission, and the Pennsylvania Consumer Advocate are participating as interested state agencies under 10 C.F.R. §2.715(c). Memorandum and Order dated September 21, 1979 at 1. Special Prehearing Conference transcript at 45. The NRC Staff requests that all the above-named intervenors answer the general interrogatories submitted.

as more complete answers become available to you. Section 2.740b requires interrogatories to be answered within 14 days of service. Five days are added to this time under §2.710 when service is by mail.

General Interrogatories to be Answered by All Intervenors

With regard to each of your admitted issues, provide the following information:

1. Identify the individual(s), if any, that you intend to present as witnesses in this proceeding on the subject matter of each of your issues. The identification should include the individual's name, affiliation, and a summary of the educational and professional background of that individual.
2. Provide a reasonable description of the substance of the testimony of any witness(es) that you intend to have testify with regard to each of your issues, including an identification of all documents that will be relied upon in that testimony.
3. Following the substantive response to each of the subsequent interrogatories posed by the Staff, identify all documents and studies relied upon by you in providing the answers to that interrogatory. The identification should be specific to the portion of the document or study relied upon. Studies shall include observations, calculations, literature and other types of work, whether recorded in writing or not, which consist of an examination or analysis of a phenomenon.

4. Following the substantive response to each of the subsequent interrogatories posed by the Staff, identify by name and affiliation each individual who has knowledge which served as the basis for the answer to that interrogatory.

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UCS Contention 9

- 9-1 Identify the specific systems within the core cooling and containment isolation systems as to which it is alleged that there is inadequate provision to inform the operator that such a system has been deliberately disabled.
- 9-2 With respect to the specific systems identified in response to Question No. 9-1, explain the bases for believing that deliberate disabling is feasible and credible.
- 9-3 With respect to the specific systems identified in response to Question No. 9-1, explain the deficiencies in the present information provided to the operator with respect to that system.

UCS Contention 10

- 10-1 Identify the specific systems within the core cooling and containment isolation system as to which it is alleged that the operator can prevent the completion of a safety function.

UCS Contention 12

- 12-1 Provide the definition used by UCS for "equipment important to safety."

UCS Contention 13

- 13-1 Identify the particular element(s) of the staff's method of determining which accidents fall within the design basis accidents which UCS alleges are faulty.

- 13-2 Identify any modifications or additions to the Staff's method of determining design basis accidents which UCS would recommend.
- 13-3 Describe any method or methods for determining design basis accidents which UCS would support.

UCS Contention 14

- 14-1 Identify those systems or components within the core cooling system which UCS believes can either cause or aggravate an accident or can be called upon to mitigate an accident. If you can provide only a partial answer, please do so.
- 14-2 If UCS feels it cannot identify all of the systems or components described in question 14-1 above, describe the method(s) acceptable to UCS for identification of such systems or components.

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Sholly Contention 14

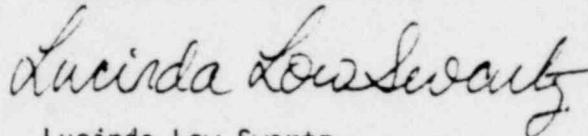
- 14-1 What criteria would be acceptable to you to evaluate licensee's demonstration that it possesses the necessary managerial and administrative capabilities required to operate Unit 1 in compliance with all applicable rules and regulations while, at the same time, properly and safely decontaminate and restore Unit 2?
- 14-2 Why do you feel licensee must demonstrate its capability to operate Unit 1 while, at the same time, restoring Unit 2? What do you mean by "restore"?
- 14-3 Identify any violations of NRC regulations and technical specifications mentioned in the first sentence of Contention No. 14 which are not directly involved in the March 28, 1979 accident.

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ECNP Contention 1(c)

- 1(c)-1 Identify the cases in which ECNP alleges that the electronic signals sent to the control room record the wrong parameters.
- 1(c)-2 Describe what ECNP regards as sufficient information on the performance capability of components to reasonably ensure that electronic signals will record, accurately and in a timely manner, all necessary and correct parameters. Specifically, what type of information is envisioned by ECNP?

Respectfully submitted,



Lucinda Low Swartz
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 27th day of December, 1979.

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METROPOLITAN EDISON COMPANY,
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(Three Mile Island, Unit 1)

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Docket No. 50-289

CERTIFICATE OF SERVICE

I hereby certify that copies of "FIRST SET OF NRC STAFF INTERROGATORIES TO INTERVENORS" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 27th day of December, 1979.

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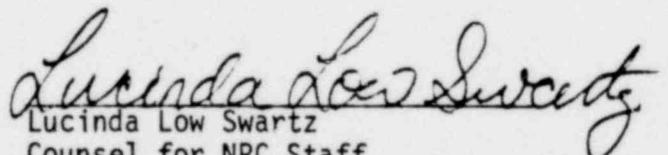
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