

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
METROPOLITAN EDISON COMPANY )  
 )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 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 therefore 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.

RESPONSE

TMI-1 has been shut down periodically for maintenance and repair

- (a) the dates TMI-1 was down for maintenance and repair are indicated in the Summary of Plant Shutdowns Monthly Reports for June 1974, July 1974, August 1974, October 1974, November 1974, March 1975, April 1975, May 1975, June 1975, September 1975, October 1975, November 1975, December 1975, January 1976, February 1976, March 1976, April 1976, May 1976, November 1976, December 1976, February 1977, March 1977,

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April 1977, May 1977, September 1977, November 1977, January 1978, February 1978, March 1978, April 1978, May 1978, February 1979 and March 1979.

- (b) The reasons for TMI-1 shutdown and whether or not the outage was scheduled or forced are indicated in the Monthly Reports.
- (c) The length of each TMI-1 shutdown is indicated in the Monthly Reports. The maintenance work performed during each shutdown is indicated in Outage Work Reports, if any. These Outage Work Reports indicate a number ("W.R.#") which number corresponds to the "Generation Corrective Maintenance System Job Ticket (Work Request) - Three Mile Island" ("Job Tickets") for each item of work performed.
- (d) The reports filed concerning outage maintenance work are the Outage Work Reports and Job Tickets.
- (e) The names of persons preparing the Outage Work Reports (these reports are not signed or approved) are Daniel Shovlin (for 1974 and 1975) and Richard Troutman (from 1975 to March 28, 1979). Their address is Metropolitan Edison Company, P.O. Box 480, Middletown, Pennsylvania, 17057. The names of the persons preparing, approving and signing the Job Tickets are indicated on each Job Ticket. Their addresses are provided in response to Interrogatory No. 28.

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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)	)	

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 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?

INTERROGATORY NO. 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.

RESPONSE

The Licensee issues the following series of procedures to its employees concerning the maintenance and repair of TMI-1 and TMI-2:

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Series 1400 - General Maintenance (Station and TMI-1)  
Mechanical Corrective Maintenance (Station and TMI-1),  
Electrical Generic Corrective Maintenance (Station and  
TMI-1), Instrument Generic Corrective Maintenance (Station  
and TMI-1), and Utility Generic Corrective Maintenance  
(Station and Unit 1).

Series E - Electrical Preventive Maintenance (Station and  
TMI-1).

Series IC - Instrument Preventive Maintenance (Station and  
TMI-1).

Series M - Mechanical Preventive Maintenance (Station and  
TMI-1).

Series U - Utility Preventive Maintenance (Station and TMI-1).

Series 3300 - Surveillance Procedures (Station and TMI-1).

Series 3500 - Fueling Procedures (Station).

Series 2300 and 2600 - Surveillance Procedures (TMI-2).

Series 2400 - Maintenance Procedures (TMI-2).

Series 2501 - Fuel Handling, Instructions and Procedures (TMI-1).

Series 1300 - Surveillance Procedures (TMI-1).

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Series 1500 - Refueling Procedures (TMI-1).

Administrative Procedures 1002, 1008, 1010, 1016, 1021, 1026 and 1027.

- (a) The foregoing procedures are in writing.
- (b) In addition, in certain instances, specific procedures pertaining to individual maintenance work are issued. These additional procedures are attached to the Generation Corrective Maintenance System Job Tickets (Work Requests) - Three Mile Island ("Job Tickets") for specific work items.
- (d) The individuals responsible for informing Licensee's maintenance employees of the foregoing procedures with respect to specific maintenance work appear on the Job Tickets. The addresses of these individuals are provided in response to Interrogatory No. 28.
- (e) The individuals responsible for enforcing the foregoing procedures with respect to specific maintenance work appear on the Job Ticket. The addresses of these individuals are provided in response to Interrogatory No. 28.

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
METROPOLITAN EDISON COMPANY )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 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?

RESPONSE

The name of each of Licensee's employees having as his job duty, or part of his job duty, the function of maintenance, repair or quality assurance related to maintenance is listed on Interrogatory No. 28 Attachment A. The addresses of such employees presently assigned to TMI are Metropolitan Edison Company, P. O. Box 480, Middletown, Pennsylvania, 17057. The address of such employees presently assigned to other work locations is listed on Interrogatory No. 28 Attachment B. The last known address of individuals no longer employed by Licensee is listed on Interrogatory No. 28 Attachment C.

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## THREE MILE ISLAND ALERT, INC.

## INTERROGATORY NO. 28 (FIRST SET)

## ATTACHMENT A

NAME	DEPT	EMP DATE	TERM DATE	1974	1975	1976	1977	1978	1979
Abromitis James C	UM	9/16/52	0/00/00	X	X	X	X	X	X
Baker Paul M	MM	10/24/73	7/31/77	X	X	X	X		
Barber Dale E	IC	1/04/77	7/31/77				X		
Barry Donald E	IC	12/25/58	0/00/00	X	X	X	X	X	X
Bayhart Joseph M	EL	6/28/71	0/00/00	X	X	X	X	X	X
Beard Donald J	UM	1/18/73	0/00/00	X	X	X	X	X	X
Beare Macklyn F	EL	7/07/70	0/00/00	X	X	X	X	X	X
Behnen Charles J	UM	6/14/76	0/00/00			X	X	X	X
Bennett Nelson K	IC	11/05/73	7/27/79	X	X	X	X	X	X
Blakeman Albert R	MM	12/15/77	8/31/78				X	X	
Bonccek William L	IC	7/08/74	0/00/00	X	X	X	X	X	X
Bonneville Susanne H	QA	9/24/73	4/30/77	X	X	X	X		
Bowman James R	EL	6/04/69	0/00/00	X	X	X	X	X	X
Bowman Ronald L	IC	7/03/67	10/07/77	X	X	X	X		
Boyd Ammon H	UM	12/02/68	0/00/00	X	X	X	X	X	X
Boyer Kenneth R	UM	8/01/74	8/31/74	X					
Brady Paul F	EL	4/18/58	0/00/00	X	X	X	X	X	X
Breidigan Ralph W	EL	4/01/79	7/17/79						X
Brenner Joseph E	UM	2/01/74	8/01/74	X					
Briley Renado O	IC	11/25/79	0/00/00						X
Brown William J	UM	1/03/77	0/00/00				X	X	X
Brubaker John R	MM	10/14/63	0/00/00	X	X	X	X	X	X
Burris Charles A	MM	2/05/74	8/31/77	X	X	X	X		
Cain Ray E	UM	2/12/73	0/00/00	X	X	X	X	X	X
Campbell James L	MM	10/12/73	9/30/75	X	X				
Capri Frank L	IC	6/06/77	3/31/78				X	X	
Carey Lester	UM	2/01/74	7/31/74	X					
Carl Robert E	UM	5/08/73	6/18/79	X	X	X	X	X	X
Cascarino Joseph G	UM	9/09/69	0/00/00	X	X	X	X	X	X
Ceresini Philip E	UM	8/01/74	8/31/74	X					
Chandlee Charles E	UM	8/01/74	8/31/74	X					
Cisney Larry G	EL	2/15/78	0/00/00					X	X
Coble John B	MM	10/27/47	0/00/00	X	X	X	X	X	X
Cody John J	UM	12/04/51	0/00/00	X	X	X	X	X	X
Colehouse Richard A	UM	5/16/79	0/00/00						X
Condran George W	EL	3/23/73	0/00/00	X	X	X	X	X	X
Conner Richard W	UM	6/08/71	0/00/00	X	X	X	X	X	X
Conrad Allen O	MM	3/23/73	0/00/00	X	X	X	X	X	X
Cooper Dennis L	UM	9/01/74	9/30/74	X					
Cotter William W	QA	3/23/73	6/30/78	X	X	X	X	X	
Crawfoot Edward R	EL	5/06/74	0/00/00	X	X	X	X	X	X
Cross Melvin R	UM	10/11/73	0/00/00	X	X	X	X	X	X
Cunningham Francis J	UM	9/25/69	10/31/77	X	X	X	X		
Cunningham Houston	UM	1/01/75	1/31/75		X				
Dahr Paul E	UM	8/01/74	8/31/74	X					
Dalpezzo Geno	UM	8/27/79	8/27/79						X
Daniels Earl W	QA	5/08/73	0/00/00	X	X	X	X	X	X

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NAME	DEPT	EMP DATE	TERM DATE	1974	1975	1976	1977	1978	1979
Darby Robert C	MM	10/13/69	0/00/00	X	X	X	X	X	X
Daugherty Dan R	UM	9/17/79	0/00/00						X
Davies Edgar M	MM	6/23/48	0/00/00	X	X	X	X	X	X
Davis Hardy	UM	5/06/78	0/00/00					X	X
Deitz Kenneth B	MM	6/10/69	0/00/00	X	X	X	X	X	X
Devera Joseph J	UM	7/10/69	10/31/77	X	X	X	X		
Dickson George R	UM	1/30/74	7/31/78	X	X	X	X	X	
Diener John A	UM	11/13/70	0/00/00	X	X	X	X	X	X
Dimeler Ralph J	EL	2/08/73	0/00/00	X	X	X	X	X	X
Diruscio Francis E	UM	2/07/74	0/00/00	X	X	X	X	X	X
Donahey William M	MM	11/10/75	0/00/00		X	X	X	X	X
Donelan Michael J	UM	12/13/71	0/00/00	X	X	X	X	X	X
Dougherty George Robert	EL	6/04/79	0/00/00						X
Douglass William J	EL	3/18/77	0/00/00				X	X	X
Dundore Luther N	EL	11/08/79	0/00/00						X
Eberly Lawrence E	IC	10/01/62	0/00/00	X	X	X	X	X	X
Ebersole Kenneth L	EL	3/26/73	0/00/00	X	X	X	X	X	X
Eddings William	UM	2/01/74	8/31/74	X					
Enders John A	UM	11/22/75	0/00/00		X	X	X	X	X
Eppinger Ned E	MM	10/08/73	0/00/00	X	X	X	X	X	X
Evans Charles H	MM	3/01/78	0/00/00					X	X
Everhart John R	MM	7/31/67	0/00/00	X	X	X	X	X	X
Feary Michael D	MM	9/03/69	0/00/00	X	X	X	X	X	X
Fenton Robert E	QA	10/19/73	4/30/75	X	X				
Fernback Richard L	IC	10/13/69	0/00/00	X	X	X	X	X	X
Filbert Harold L	UM	11/09/79	11/16/79						X
Fischer Richard B	MM	12/01/73	4/30/74	X					
Fornicola John C	QA	8/30/76	7/22/79			X	X	X	X
Fornwalt Ronald E	UM	10/02/78	0/00/00					X	X
Freeman James F	IC	10/26/77	0/00/00				X	X	X
Galbraith Dennis C	UM	8/01/74	8/31/74	X					
Games John N	MM	8/01/69	0/00/00	X	X	X	X	X	X
Gee Diane	QA	4/24/74	0/00/00	X	X	X	X	X	X
Gilbert John R	IC	11/20/76	0/00/00			X	X	X	X
Gilbert Timothy R	IC	2/26/73	0/00/00	X	X	X	X	X	X
Gipe John H	UM	12/01/73	8/31/74	X					
Giulivo Louis M	UM	2/04/78	0/00/00					X	X
Gonzalez J A	UM	3/06/72	0/00/00	X	X	X	X	X	X
Graby Richard K	EL	3/18/69	0/00/00	X	X	X	X	X	X
Green Dolores A	UM	10/09/78	0/00/00					X	X
Greenawalt Jack R	UM	11/10/77	0/00/00				X	X	X
Grim Michael L	EL	4/27/70	0/00/00	X	X	X	X	X	X
Grim Terry L	UM	9/11/61	0/00/00	X	X	X	X	X	X
Grimm Michael N	IC	1/05/77	10/31/78				X	X	
Grubb Gary W	MM	2/20/63	0/00/00	X	X	X	X	X	X
Grumbling Marlene F	UM	4/02/79	0/00/00						X
Gusley Michael J	UM	8/26/69	12/08/75	X	X				
Gutierrez Arthur J	MM	9/28/72	0/00/00	X	X	X	X	X	X
Hahn Edward D	EL	8/28/73	0/00/00	X	X	X	X	X	X
Hansell George H	MM	9/15/69	0/00/00	X	X	X	X	X	X
Harper Richard R	IC	5/29/79	0/00/00						X
Harsh James F	IC	2/04/74	10/19/79	X	X	X	X	X	X
Heffner Edward A	IC	4/19/76	0/00/00			X	X	X	X
Heintzelman Gary W	UM	1/10/73	0/00/00	X	X	X	X	X	X

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NAME	DEPT	EMP DATE	TERM DATE	1974	1975	1976	1977	1978	1979
Henrich Michael L	EL	3/29/74	11/30/77	X	X	X	X		
Herneisey Neal S	MM	3/24/48	0/00/00	X	X	X	X	X	X
Heysek William G	QA	9/16/74	0/00/00	X	X	X	X	X	X
Hipple Tim R	EL	3/19/71	0/00/00	X	X	X	X	X	X
Hockensmith Harold L	EL	4/02/79	5/06/79						X
Hockley Michael D	IC	6/07/71	0/00/00	X	X	X	X	X	X
Hoff Kenneth L	UM	6/09/77	12/31/77				X		
Horst Gary L	EL	5/27/69	10/31/76	X	X	X			
Hosking Douglas L	QA	2/09/76	0/00/00			X	X	X	X
Hullman John C	MM	2/20/79	7/31/79						X
Hunter Crawford	EL	6/16/79	0/00/00	X	X	X	X	X	X
Icard Johnny R	EL	10/12/76	5/31/78			X	X	X	
Ierley Charles A	UM	7/18/73	8/31/77	X	X	X	X		
James Zale L	QA	9/01/77	0/00/00				X	X	X
Janeshefskie Edward J Jr	IC	12/10/79	0/00/00						X
Jenkins Richard A	EL	7/07/69	0/00/00	X	X	X	X	X	X
Jennings Roy L	MM	3/31/79	0/00/00						X
Johnson Milton W	QA	5/31/73	10/31/76	X	X	X			
Jones Mark C	IC	8/03/76	0/00/00			X	X	X	X
Joyce Matthew A	IC	1/04/79	9/19/79						X
Jules Samuel E	MM	9/28/73	0/00/00	X	X	X	X	X	X
Kalenevitch Barry R	IC	2/22/77	0/00/00				X	X	X
Keene Paul L	IC	7/25/74	11/09/79	X	X	X	X	X	X
Keller Mark L	EL	3/19/77	0/00/00				X	X	X
Kelley Patrick F	IC	6/13/77	0/00/00				X	X	X
Kemble David A	MM	2/12/69	0/00/00	X	X	X	X	X	X
Kern Jack E	EL	2/10/53	0/00/00	X	X	X	X	X	X
Kerstetter Harry L	UM	5/04/76	5/31/76			X			
Kiefer M John	UM	10/30/69	10/31/77	X	X	X	X		
Kinter Darrell S	IC	7/01/74	0/00/00	X	X	X	X	X	X
Kintzer Lynn C	UM	4/25/79	5/14/79						X
Kipp John M	UM	11/30/79	0/00/00						X
Kivler Joseph E	UM	10/09/73	0/00/00	X	X	X	X	X	X
Kline Kenneth S	UM	8/19/68	0/00/00	X	X	X	X	X	X
Kline Sidney P	EL	4/02/79	5/16/79						X
Knezic Joseph F	UM	11/01/71	6/30/78	X	X	X	X	X	
Knoche Alan J	IC	8/23/74	0/00/00	X	X	X	X	X	X
Koser Kenneth J	UM	2/14/74	9/30/74	X					
Kreider Kenneth J	UM	1/02/69	9/30/75	X	X				
Krupilis Charles J	UM	10/18/73	8/28/74	X					
Labar Peter A	IC	8/15/78	0/00/00					X	X
Labby David G	MM	10/23/73	4/30/77	X	X	X	X		
Laime Leon A	QA	3/04/74	2/21/75	X	X				
Lang David C	IC	7/15/68	10/31/77	X	X	X	X		
Langeheine Stephen P	IC	10/28/68	0/00/00	X	X	X	X	X	X
Lau Christopher E	UM	1/29/73	9/30/74	X					
Laudermilch Homer R	EL	4/22/79	0/00/00						X
Lawrence Edward G	IC	8/26/74	0/00/00	X	X	X	X	X	X
Leakway Murray N	MM	6/01/53	0/00/00	X	X	X	X	X	X
Lehew Jack G	MM	10/15/73	0/00/00	X	X	X	X	X	X
Lehigh Steven D	IC	9/12/73	9/30/76	X	X	X			
Lehman Kenneth R	EL	2/20/79	0/00/00						X
Leonard Clarence F	MM	2/19/74	0/00/00	X	X	X	X	X	X
Light Gene R	EL	8/26/68	0/00/00	X	X	X	X	X	X

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NAME	DEPT	EMP DATE	TERM DATE	1974	1975	1976	1977	1978	1979
Lingg David H	UM	10/30/74	12/31/77	X	X	X	X		
Long Warren R	UM	8/19/68	12/08/75	X	X				
Ludwig Harold P	MM	6/16/79	8/30/79						X
Lutz Robert A	EL	2/28/79	0/00/00						X
Mackey Terrance A Jr	QA	3/30/78	0/00/00					X	X
Marinkov Milton	MM	1/03/73	0/00/00	X	X	X	X	X	X
Matarazzi Clyde D	EL	7/09/69	0/00/00	X	X	X	X	X	X
McConnell Daryl K	QA	9/25/78	0/00/00					X	X
McCurdy David E	MM	7/21/69	0/00/00	X	X	X	X	X	X
McElwee Roy J	UM	6/06/74	7/17/74	X					
McGarry John J	UM	7/09/73	0/00/00	X	X	X	X	X	X
McKinney Carl F	UM	2/18/57	0/00/00	X	X	X	X	X	X
Meck Earl A	MM	4/14/47	0/00/00	X	X	X	X	X	X
Menser Ronald L	IC	10/06/69	0/00/00	X	X	X	X	X	X
Messinger Dean B	UM	2/08/74	8/31/74	X					
Miller Ralph G	EL	5/22/79	0/00/00						X
Mitchell Hillary M	EL	8/06/73	0/00/00	X	X	X	X	X	X
Mondulick Ronald J	IC	11/16/76	10/31/77			X	X		
Moyer Charles W	MM	4/14/69	0/00/00	X	X	X	X	X	X
Moyer James E	MM	6/22/70	0/00/00	X	X	X	X	X	X
Murano John J	QA	2/02/76	4/23/76			X			
Myers George W	MM	2/12/48	0/00/00	X	X	X	X	X	X
Myers Ronald A	QA	1/02/75	5/28/76		X	X			
Nagle Gary L	MM	9/01/66	0/00/00	X	X	X	X	X	X
Natale Ronald D	MM	9/29/69	0/00/00	X	X	X	X	X	X
Neagle James D	IC	10/14/76	8/31/78			X	X	X	
Nebinger Donald W	MM	2/27/67	0/00/00	X	X	X	X	X	X
Neidig Ralph E	QA	1/04/71	0/00/00	X	X	X	X	X	X
Newton Clarence E	MM	11/24/72	0/00/00	X	X	X	X	X	X
Norman Ellis R	IC	5/18/78	0/00/00					X	X
Nye Louis G	UM	4/09/53	0/00/00	X	X	X	X	X	X
ODonnell Ralph A	MM	11/20/72	0/00/00	X	X	X	X	X	X
Parmer Ronald L	UM	4/01/76	4/30/76			X			
Paules James R	IC	2/08/78	0/00/00					X	X
Peavy Philip E	IC	11/01/78	0/00/00					X	X
Peifer Barry J	MM	6/30/69	10/31/77	X	X	X	X		
Peiffer Richard E	UM	7/30/79	0/00/00						X
Peiffer Walter W	EL	5/22/39	1/31/77	X	X	X	X		
Peters Bradford S	EL	2/21/79	3/30/79						X
Petersen Richard E	UM	6/11/69	12/31/75	X	X				
Phillips Luther T	UM	10/28/68	10/13/75	X	X				
Pickel Carl G	MM	9/26/79	9/30/79						X
Polomski Frank E	UM	6/12/74	7/17/74	X					
Potter John J	QA	5/06/76	9/30/79			X	X	X	X
Powell James C	QA	10/23/70	0/00/00	X	X	X	X	X	X
Powell Kenneth C	UM	3/08/78	0/00/00					X	X
Pratt Marshall M Jr	IC	9/25/78	0/00/00					X	X
Principe Joseph V	QA	5/19/75	6/30/78		X	X	X	X	
Quinnette James W	QA	1/01/79	0/00/00						X
Rahm Art J	QA	8/04/75	5/27/76		X	X			
Reich David E	IC	3/17/69	0/00/00	X	X	X	X	X	X
Reid Dale E	UM	7/01/68	4/16/79	X	X	X	X	X	X
Reider William H	UM	3/31/79	0/00/00						X
Reigle William M	UM	3/09/70	8/17/79	X	X	X	X	X	X
Reinbold Albert C	MM	8/07/79	8/31/79						X
Reismiller Norman C	MM	10/03/57	5/31/78	X	X	X	X	X	

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NAME	DEPT	EMP DATE	TERM DATE	1974	1975	1976	1977	1978	1979
Reanud William E	UM	11/08/79	0/00/00						X
Repman Elwood G	UM	7/16/79	0/00/00						X
Resanovich John	UM	11/08/72	0/00/00	X	X	X	X	X	X
Reynolds Lee G	EL	2/21/79	0/00/00						X
Richards Thomas P	MM	4/26/71	0/00/00	X	X	X	X	X	X
Ridley Richard L	MM	2/07/74	0/00/00	X	X	X	X	X	X
Riggenbach Thomas	IC	2/21/74	9/11/79	X	X	X	X	X	X
Rippon Charles E	EL	9/21/70	0/00/00	X	X	X	X	X	X
Rishar John R	UM	5/01/74	0/00/00	X	X	X	X	X	X
Rittle Barry J	EL	11/01/69	0/00/00	X	X	X	X	X	X
Roch Gerald F	IC	10/03/77	8/15/79				X	X	X
Rodriguez Victor M	UM	9/25/79	0/00/00						X
Rollin John L	MM	7/10/74	0/00/00	X	X	X	X	X	X
Roth Michael D	UM	9/29/69	12/08/75	X	X				
Rowe Chester D	QA	5/16/77	0/00/00				X	X	X
Rowe Craig E	MM	2/07/74	8/31/77	X	X	X	X		
Rupert Roddy R	IC	5/23/78	9/30/78					X	
Ruth Jeffrey L	IC	1/03/74	5/13/76	X	X	X			
Ryan George P	UM	7/08/69	0/00/00	X	X	X	X	X	X
Rychetsky Joe S	QA	12/01/76	7/31/77			X	X		
Scarborough James R	MM	4/11/78	4/30/78					X	
Schein Delroy C	IC	10/04/71	0/00/00	X	X	X	X	X	X
Schlehr Robert D	IC	5/10/79	5/10/79						X
Schoedler Randolph S	IC	10/17/73	7/18/75	X	X				
Schwab Paul S	MM	8/07/79	8/31/79						X
Seiders Glenn A	UM	2/02/78	0/00/00					X	X
Shade Paul D	UM	7/08/76	10/31/77			X	X		
Shirk Kent W	IC	12/03/79	0/00/00						X
Short Emily M	UM	7/09/76	0/00/00			X	X	X	X
Showers Larry E	UM	7/07/69	10/31/77	X	X	X	X		
Shultz Connie L	UM	4/01/79	0/00/00						X
Shumaker William E	QA	1/03/78	0/00/00					X	X
Sims Herbert C	UM	9/09/69	9/30/77	X	X	X	X		
Sinkovich Michael L	EL	4/19/79	0/00/00						X
Sipe Jack W	IC	7/30/62	0/00/00	X	X	X	X	X	X
Smith James W	UM	4/13/77	8/31/78				X	X	
Smyser David W	UM	10/02/79	0/00/00						X
Snow Richard A	MM	7/07/75	0/00/00		X	X	X	X	X
Snyder Melvin G	IC	6/01/78	0/00/00					X	X
Spitler Miles R	EL	11/04/79	0/00/00						X
Sprandel Patricia A	UM	4/02/79	0/00/00						X
St Clair Joseph F	IC	5/26/69	0/00/00	X	X	X	X	X	X
St Pierre Robert L	QA	1/06/76	0/00/00			X	X	X	X
Stambaugh Guilford E	MM	5/01/70	0/00/00	X	X	X	X	X	X
Stetler Ronald E	UM	8/06/73	0/00/00	X	X	X	X	X	X
Stone Robert S	UM	5/14/79	0/00/00						X
Straub Lawrence J	IC	11/19/73	7/30/76	X	X	X			
Strine Kenneth E	UM	4/06/70	1/31/78	X	X	X	X	X	
Summy Jeffrey S	IC	9/19/77	3/31/78				X	X	
Tennis Harvey W	EL	8/15/73	0/00/00	X	X	X	X	X	X
Thomas Richard T	MM	2/05/74	0/00/00	X	X	X	X	X	X
Tice Landis E	UM	3/28/78	0/00/00					X	X
Tinnes Phillip F	IC	3/21/74	0/00/00	X	X	X	X	X	X
Tooie Michael F	IC	9/11/73	0/00/00	X	X	X	X	X	X

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NAME	DEPT	EMP DATE	TERM DATE	1974	1975	1976	1977	1978	1979
Torres Benito	UM	5/02/78	0/00/00					X	X
Torres Jose M	UM	5/06/76	5/31/76			X			
Trautman Robert H	UM	11/13/61	0/00/00	X	X	X	X	X	X
Tremblay Keith M	QA	1/29/79	0/00/00						X
Trythall Samuel A	EL	10/05/72	0/00/00	X	X	X	X	X	X
Tucker Roger E	QA	8/28/73	4/30/74	X					
Umberger Richard R	MM	1/08/73	0/00/00	X	X	X	X	X	X
Verna Gary A	UM	3/30/78	0/00/00					X	X
Vincent Carl E	IC	2/08/77	0/00/00				X	X	X
Vuxta William Sr	MM	3/04/63	0/00/00	X	X	X	X	X	X
Wagner Clarence E	EL	4/01/79	0/00/00						X
Wagner Patrick M	EL	10/02/72	0/00/00	X	X	X	X	X	X
Waple Frank R	UM	12/05/79	0/00/00						X
Wassmer John	UM	9/08/69	4/30/76	X	X	X			
Waters Isacc L Jr	UM	8/28/78	0/00/00					X	X
Watters John F	EL	3/16/70	0/00/00	X	X	X	X	X	X
Weaver Aprile K	UM	8/01/76	0/00/00			X	X	X	X
Weaver Douglas E	IC	11/30/71	0/00/00	X	X	X	X	X	X
Webster David C	EL	9/01/78	0/00/00					X	X
Welsh Paul E Jr	UM	4/29/77	0/00/00				X	X	X
Welsh Paul E Sr	UM	12/19/46	6/05/79	X	X	X	X	X	X
Wike Ronald E	IC	7/18/77	4/27/79				X	X	X
Wilsbach William J	MM	3/01/74	0/00/00	X	X	X	X	X	X
Wilson Harold L	IC	4/05/71	0/00/00	X	X	X	X	X	X
Wintrobe Donald L	MM	7/17/79	0/00/00						X
Wise Guy E	MM	9/11/72	0/00/00	X	X	X	X	X	X
Witman Charles O	MM	10/17/73	0/00/00	X	X	X	X	X	X
Wolf Dennis H	UM	7/21/69	10/31/76	X	X	X			
Volfe Gordon R	MM	7/16/73	0/00/00	X	X	X	X	X	X
Wright Thomas J	IC	8/31/76	0/00/00			X	X	X	X
Wright William J	IC	11/09/78	0/00/00					X	X
Wunderlich Thomas C	EL	6/02/69	0/00/00	X	X	X	X	X	X
Wynn Charles A	IC	9/30/68	0/00/00	X	X	X	X	X	X
Yeager William A	IC	2/14/77	0/00/00				X	X	X
Yeagley Carl J	IC	8/05/74	8/31/77	X	X	X	X		
Yurejefcic James N	EL	2/20/79	8/31/79						X
Shovlin Daniel	MM			X	X	X	X	X	X
Seisleitz Richard	MM						X	X	X
Hawkins Thomas	MM								X
Eisenhour Elmer	UM			X	X	X	X		

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THREE MILE ISLAND ALERT, INC.  
INTERROGATORY NO. 28 (FIRST SET)

ATTACHMENT B

<u>Name</u>	<u>Present Address</u>
Breidigan, Ralph W.	P. O. Box 240, Lebanon, PA 17042
Cotter, William W.	P. O. Box 458, Portland, PA 18351
Cunningham, Francis J.	501 Parkway Blvd., York, PA 17404
Cunningham, Houston	P. O. Box 240, Lebanon, PA 17042
Devera, Joseph J.	P. O. Box 542, Reading, PA 19640
Filbert, Harold L.	Titus, P. O. Box 542, Reading, PA 19640
Phillips, Luther T.	P. O. Box 240, Lebanon, PA 17042
Shade, Paul D.	P. O. Box 542, Reading, PA 19640
Showers, Larry E.	501 Parkway Blvd., York, PA 17404
Wolf, Dennis H.	P. O. Box 240, Lebanon, PA 17042
Yurejefcic, James N.	P. O. Box 240, Lebanon, PA 17042

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## THREE MILE ISLAND A

INTERROGATORY NO. 28 (F. 1 SET)

## ATTACHMENT C

<u>Name</u>	<u>Last Known Address</u>
Baker, James C	3275 Chess Dr, Bay City, Mich 48706
Barber, Dale E	R.D. 1, Box 115, Marietta, PA 17547
Bennett, Nelson K	223 Delmont St, Middletown, PA 17057
Blakeman, Albert R	Box 1447, Gibson, B.C. Canada VONIVO
Bonneville, Susanne H	Unknown
Bowman, Ronald L	Box 916, L.O.W., Locust Grove, VA 22508
Brenner, Joseph E	P.O. Box 111, Rheems, PA 17570
Burris, Charles A	492 W. High St, Elizabethtown, PA 17022
Campbell, James L	236 Russell Ave, Middletown, PA 17057
Capri, Frank L	42 Cornell Ave, Gloucester Heights, NJ 08030
Carey, Lester	44 N 17th St, Harrisburg, PA 17103
Carl, Robert E	853 Mt Gretna Rd, Elizabethtown, PA 17022
Ceresini, Philip E	209 S. 10th St, Lebanon, PA 17042
Coble, John B	Retired - Unknown
Cooper, Dennis L	1013 Ridgewood Rd, York, PA 17402
Dickson, George R	R.D. 1, Box 103A, Hershey, PA 17033
Eddings, William	1727 Walnut St, Harrisburg, PA 17103
Fenton, Robert E	321 W. Market St, Annville, PA 17003
Fischer, Richard B	1281A 147th Ave, San Leandro, Calif 94578
Fornicola, John C	537 Martin Ave, Mt Joy, PA 17552
Galbraith, Dennis C	26 Clearview Dr, Lebanon, PA 17042
Gipe, John H	R.D. 2, Ridge Rd, Elizabethtown, PA 17022
Grimm, Michael N	214 W. Main St, Palmyra, PA 17078
Gusley, Michael J	709 Hartman Ave, Temple, PA 19560
Harsh, James F	404 E. Clay St, Lancaster, PA 17602
Henrich, Michael L	Village Green, Elizabethtown, PA 17022
Horst, Gary L	Box 263, Bainbridge, PA 17502
Icard, Johnny R	105 Oak Knoll Rd, New Cumberland, PA 17070
Ierley, Charles A	123 Ann St, Middletown, PA 17057
Johnson, Milton W	4036 Garland Dr, Jackson, Mich 49201
Joyce, Matthew A	130 Blydenburg Ave, New London, Conn 06320
Keene, Paul L	R.D. 1, Box 16X, Pequea, PA 17565
Koser, Kenneth J	Deceased
Krupilis, Charles J	132 E. Water St, Middletown, PA 17057
Labby, David G	P.O. Box 54, Bainbridge, PA 17502
Laime, Leon A	421 Washington St, Norwich, Conn 06360
Lang, David C	Box 308 Hill Rd, St. Leonard, MD 20685
Lehigh, Steven D	Deceased
Long, Warren R	309 Jackie Ave, Robeson, PA 19551
Messinger, Dean B	1414 King St, Lebanon, PA 17042
Mondulick, Ronald J	3 Devonshire, E. Willow Dr, Elizabethtown, PA 17022
Murano, John J	5086 Lilac Lane, Apt T1, Harrisburg, PA 17111
Myers, Ronald A	330 Rivermore Dr, Marietta, PA 17547
Neagle, James D	713 Spruce St, Middletown, PA 17057
Parmer, Ronald L	R.D. 1, Elizabethtown, PA 17022
Peifer, Barry J	R.D. 2, Box 3480, Elizabethtown, PA 17022



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)	)	

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 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?

INTERROGATORY NO. 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.

RESPONSE

Licensee conducts three types of regularly scheduled meetings concerning maintenance and repair for TMI, namely: Plan of the Day meetings, Refueling meetings and No-Name Outage meetings.

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- (a) Plan of the Day Meetings - The last meeting for TMI-1, prior to March 28, 1979, was held on February 16, 1979. TMI-1 was in a scheduled outage for refueling from February 17, 1979 to March 28, 1979, therefore no such meetings were conducted during this period. The last meeting for TMI-2 prior to March 28, 1979, was held on March 25, 1979.

Refueling Meetings - The last meeting for TMI-1, prior to March 28, 1979, was held on February 14, 1979. There were no such meetings for TMI-2.

No-Name Outage Meetings - The last meeting for TMI-2, prior to March 28, 1979, was held on February 14, 1979, and was the same meeting as the Refueling meeting. The last meeting for TMI-2, prior to March 28, 1979, was held on March 20, 1979.

- (b) The meetings were held on site at Three Mile Island.

- (c) Plan of the Day Meetings - The persons in charge of the last meetings were either J. L. Seelinger or Michael Ross for TMI-1 and J. B. Logan or J. R. Floyd for TMI-2. Since no minutes are required to be maintained of these meetings and therefore are not prepared, Licensee is unable to state with certainty which individuals were in charge. The address of Michael Ross, J. B. Logan and J. R. Floyd is Metropolitan Edison Company, P. O. Box 480, Middletown, Pennsylvania 17057. The last known address of J. L. Seelinger is 2745 Omega Place, North Palm

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Beach, Florida 33402.

Refueling Meetings - The person in charge of the last meeting for TMI-1 was W. E. Potts. The address of W. E. Potts is Metropolitan Edison Company, P. O. Box 480, Middletown, Pennsylvania 17057. There were no such meetings for TMI-2.

No-Name Outage Meetings - The person in charge of the last meeting for TMI-1 was W. E. Potts. The person in charge of the last meeting for TMI-2 was R. E. Sieglitz. The address of R. E. Sieglitz is Metropolitan Edison Company, P. O. Box 480, Middletown, Pennsylvania 17057.

(d) The topics discussed at these last meetings are set forth in the documents which will be made available as more fully set forth in response (f) of this Interrogatory.

(e) Plan of the Day Meetings - The persons having custody of the agenda (although there are no legal retention requirements for this document and, therefore, not all agenda are retained) are said Michael Ross for TMI-1 and Richard Sieglitz for TMI-2.

Refueling Meetings - The person having custody of the documents (although there are no legal retention requirements for these documents and, therefore, not all documents are retained) is R. C. Troutman. The address of R. C. Troutman is Metropolitan Edison Company, P. O. Box 480, Middletown, Pennsylvania 17057.

No-Name Outage Meetings - The person having custody of the No-Name Outage forms for TMI-1 (although there are no legal retention requirements for these documents and, therefore, not all documents are retained) is T. Hawkins. The address of T. Hawkins is Metropolitan Edison Company, P. O. Box 480, Middletown, Pennsylvania 17057. The person having custody of the No-Name Outage forms for TMI-2 is said R. E. Sieglitz.

- (f) The identifiable records for such meetings are the presently existing Plan of the Day agenda for TMI-1 and TMI-2, Refueling Outage Plan for TMI-1 and the No-Name Outage forms for TMI-1 and TMI-2 and will be made available at Licensee's Discovery Room (Metropolitan Edison Company), Crawford Station, Middletown, Pennsylvania.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
METROPOLITAN EDISON COMPANY )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 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?

RESPONSE

Licensee's information concerning anyone's knowledge, or complaint of maintenance problems at TMI-1 from April 19, 1974 to March 28, 1979 and TMI-2 from February 28, 1978 to March 28, 1979, is reflected in Licensee's retained forms entitled "Generation Corrective Maintenance System Job Ticket (Work Request) - Three Mile Island" (Job Tickets). For these periods there are some 40,000 Job Tickets in Licensee's files.



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
METROPOLITAN EDISON COMPANY )  
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Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 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?

INTERROGATORY NO. 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.

RESPONSE

Licensee has not obtained statements from individuals regarding maintenance. However, Licensee does have four types of reports which reflect personal opinions related to maintenance, which are: Audits of Maintenance Activities, On The Job Observation Reports, Non-Conformance Reports and QC Surveillance Reports.

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
METROPOLITAN EDISON COMPANY )  
 )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 36

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

RESPONSE

The Licensee's procedures as of March 28, 1979, for determining preventive or remedial maintenance or repair are the Preventive Maintenance Procedures and Station Corrective Maintenance Procedure 1407-1, referenced in the response to Interrogatory Nos. 26 and 27. The TMI-1 and TMI-2 Technical Specifications also deal with preventive maintenance.

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
METROPOLITAN EDISON COMPANY )  
 )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 37

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

INTERROGATORY NO. 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.

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RESPONSE

Licensee utilizes "Generation Corrective Maintenance System Job Tickets (Work Requests) - Three Mile Island" ("Job Tickets") to identify a need for maintenance and/or repair and to authorize such work.

- (a) The organization structure of the supervisory maintenance operations personnel for TMI-1 and TMI-2 as of March 28, 1979, together with the names of individuals holding the positions is set forth in Interrogatory No. 38 Attachment A.

The mailing address of the foregoing personnel is provided in response to Interrogatory No. 28.

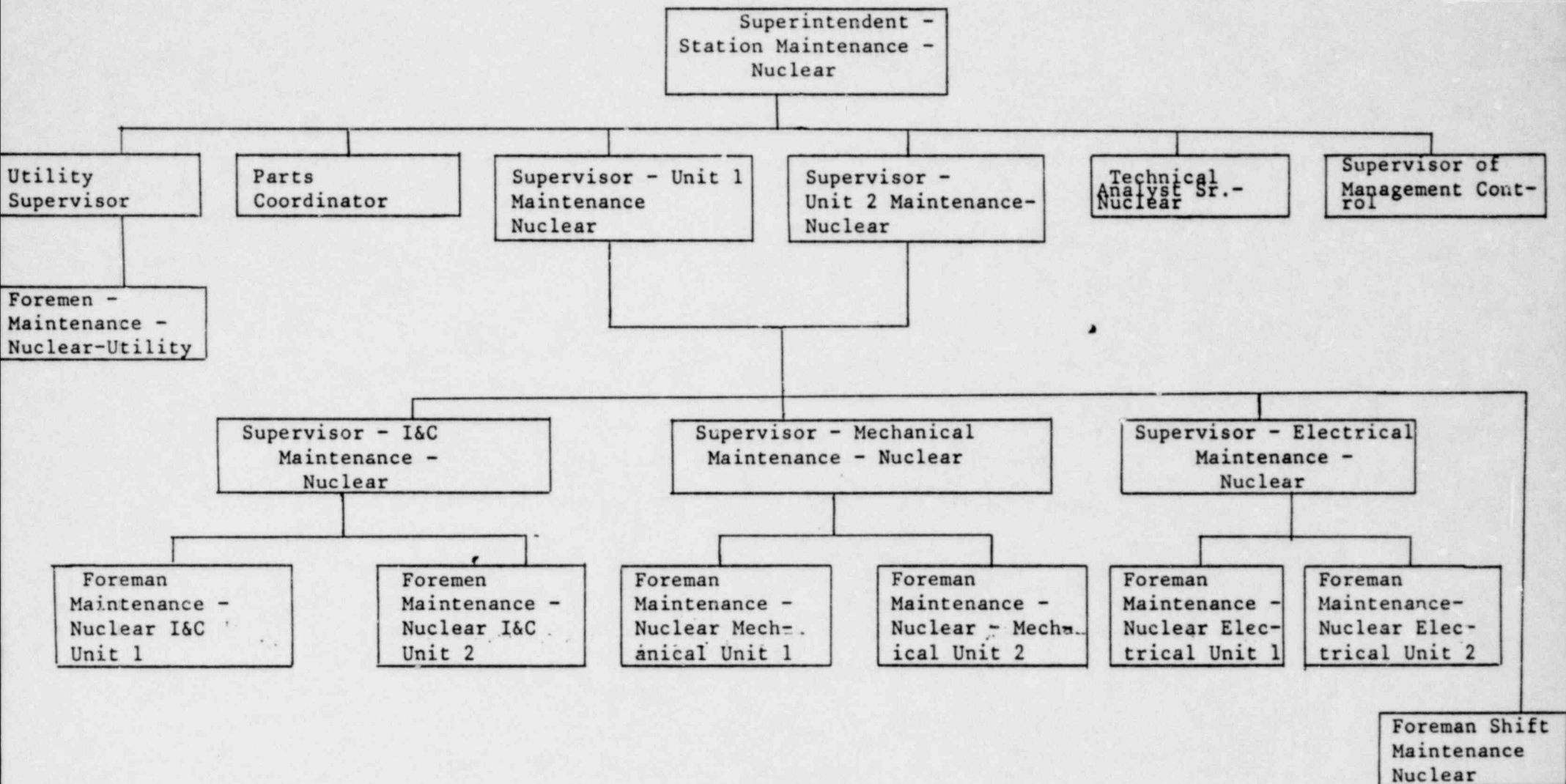
- (b) The Job Tickets identify the name of each person responsible for approving or disapproving specific Job Tickets for TMI-1 and TMI-2 during the twelve months preceding the March 28, 1979 accident. The addresses of such persons are provided in response to Interrogatory No. 28.
- (c) The Job Tickets are dated and indicate the date the work was completed.
- (e) The Job Tickets indicate the work that was found necessary, the date authorized and the date completed.

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- (f) The Job Tickets indicate the repairs and/or maintenance recommended to be done but not authorized or done.
- (g) The names of Licensee's supervisory employees involved in the performance of work and certifying the work was completed are indicated on the Job Tickets. The addresses of these employees are provided in response to Interrogatory No. 28. Licensee is unable to identify individual craft personnel because such information with respect to specific Job Tickets is not recorded in Job Tickets or elsewhere.



THREE MILE ISLAND ALERT, INC.  
INTERROGATORY NO. 38 (FIRST SET)  
ATTACHMENT A



TMI STATION MAINTENANCE ORGANIZATION AS OF MARCH 28, 1979

1694 027

Superintendent-Station Maintenance-Nuclear: D. Shovlin

Supervisor-Utility: E. Eisenhower

Parts Coordinator: K. Dunlap

Supervisor-Unit 1-Maintenance-Nuclear: T. Hawkins

Supervisor-Unit 2-Maintenance-Nuclear: D. Sieglitz

Technical Analyst Sr.-Nuclear:D. Barry

Supervisor of Management Control: R. C. Troutman

Foremen-Maintenance-Nuclear-Utility: K. Kline, J. Abromitis, T. Grim,  
B. Trautman, C. McKinney

Supervisor I&C Maintenance-Nuclear: M. Snyder

Foreman-Maintenance-Nuclear-I&C-Unit 1: H. Wilson, M. Toole, E. Lawrence

Foreman-Maintenance-Nuclear-I&C-Unit 2: D. Weaver, J. Gilbert, N. Bennet

Supervisor-Mechanical Maintenance-Nuclear: J. McGary

Foreman-Maintenance-Nuclear-Mechanical-Unit 1: N. Herneisey, E. Meck,  
G. Stambaugh, W. Donahey, C. Leonard

Foreman-Maintenance-Nuclear-Mechanical-Unit 2: S. Jules, J. Games, A. Conrad

Supervisor-Electrical Maintenance-Nuclear: H. Mitchell

Foreman-Maintenance-Nuclear-Electrical-Unit 1: J. Bowman, E. Crawfoot, M. Beare

Foreman-Maintenance-Nuclear-Electrical-Unit 2: C. Rippon, B. Rittle

Foreman-Shift Maintenance-Nuclear: G. Light, B. Kalenevitch, R. Snow,  
M. Leakway, A. Knoche

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
METROPOLITAN EDISON COMPANY )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 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?

INTERROGATORY NO. 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.

RESPONSE

Licensee's records include copies of NRC inspection reports and related correspondence for the period eighteen months prior to March 28, 1979. The inspection reports provide the dates of associated inspections by NRC. These documents have not been segregated and placed into Licensee's Discovery Reading Room, but are available in the NRC Public Document Room in Washington and will be available in the TMI Local Document Room in

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Harrisburg by December 30, 1979, in the following entitled  
correspondence files:

"2) APPL CORRESPONDENCE FILE", "3) APPL CORRESPONDENCE FOLDER"

"16) INSPECTION FILE", "17) INSPECTION FOLDER"



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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Docket No. 50-289  
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LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 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?

INTERROGATORY NO. 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.

RESPONSE

51. Licensee is in the process of physically separating TMI Units 1 and 2. This effort is described in the TMI-1 Restart Report, previously provided to TMIA. As a result, Licensee's ability to manage an accident at TMI-1 will not be dependent on conditions at TMI-2.

With respect to TMI-1, Licensee has taken steps to assure

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that an accident similar to that which occurred at TMI-2 does not occur at TMI-1. These efforts are described in the TMI-1 Restart Report. In addition, consistent with the defense-in-depth approach, Licensee has taken steps to ensure that should a TMI-2 type accident occur at TMI-1, Licensee will be able to better manage that accident. These efforts are described in the TMI-1 Restart Report and in Licensee's updated Emergency Plan, also previously provided to TMIA. They are designed to assure that Licensee can detect, understand, analyze, control and mitigate any such accident.

52(a) The relevant portions of the TMI-1 Restart Report were prepared by:

David Slear  
Gary Broughton  
Edward Fuhrer  
Ronald Williams  
Courtney Smythe

Metropolitan Edison Company  
P. O. Box 480  
Middletown, PA 17057

Walter Steidle

Gilbert Commonwealth  
P. O. Box 1498  
Reading, PA 19603

Thomas Fairburn  
Robert Hamm

Babcock & Wilcox  
P. O. Box 1260  
Old Forrest Road  
Lynchburg, VA 24505

The updated Emergency Report was prepared by:

Alexis Tsaggaris  
Leonard Landry  
Richard Dubiel

Metropolitan Edison Company  
P. O. Box 480  
Middletown, PA 17057

1694 032

John Allman  
Raymond Hal'mark  
Samuel Baggett  
Bruce Center

Energy Incorporated  
P. O. Box 736  
Idaho Falls, Idaho 83401

Keith Woodard  
Thomas Potter

Pickard, Lowe & Garrick  
1200 18th Street, N.W.  
Washington, D.C. 20036

52(b) To the extent such data still exists, it is in the files  
of the individuals identified in the response to  
Interrogatory No. 52(a).

52(c) The TMI-1 Restart Report and Licensee's updated Emergency  
Plan have previously been provided to TMIA.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
METROPOLITAN EDISON COMPANY )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 53

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

INTERROGATORY NO. 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 study or analysis.

RESPONSE

53. Yes. Studies or analyses concerning the decontamination of TMI-2 include the following:

- (a) Auxiliary and Fuel Handling Building Waste Water Processing: design criteria; analysis of use options.
- (b) Auxiliary and Fuel Handling Building Decontamination: selection criteria; scoping document.
- (c) Reactor Building Waste Water Processing: design criteria; vendor proposals; proposal analysis.

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(d) Reactor Building Decontamination

- i. Reactor Building Purge Program
- ii. Phase I Bechtel Report
- iii. Phases I & II Summary Technical Plan for TMI-2 Decontamination

54. The studies and analyses were prepared by the following individuals and consultant/contractors:

Michael Morrell	Metropolitan Edison Company
Richard McGoey	P. O. Box 480
Edward Fuller	Middletown, PA 17057
Leroy Harding	
Robert Arnold	
John DeVine	
Gilbert Staudt	
Michael Ross	
Earl Showalter	
James Renshaw	
John Barton	
Clark Ice (since left Met-Ed/GPU)	
Edward Fuhrer	

James Thiesing	Bechtel Power Corp.
Robert Rider	15740 Shady Grove Road
	Gaithersburg, MD 20760

John Remark (since left B&W)	Babcock & Wilcox Co.
	P. O. Box 1260
	Old Forest Road
	Lynchburg, VA 24505

William Shannon	Oakridge National Laboratory
James Snyder	P. O. Box X
	Oakridge, Tenn. 37830

Allen Miller	Electric Power Research
	Institute
	3412 Hillview Avenue
	Palo Alto, CA 94304

Dennis Ferigno

Gilbert Commonwealth  
P. O. Box 1498  
Reading, PA 19603

Thomas Osterhoudt

Independent Consultant  
Metropolitan Edison Company  
P. O. Box 480  
Middletown, PA 17057

Joseph Levendusky

EPICOR, Inc.  
1375 East Linden Avenue  
P. O. Box 608  
Linden, NJ 07036

Richard Capolupo

Capolupo/Gundel  
142 Elm Street  
Salisbury, Mass. 01950

Brock Presgrove

NUS Corporation  
4 Research Place  
Rockville, MD 20850

Ben Rusche

South Carolina Energy  
Research Institute  
Suite 620  
First National Bank  
Main & Washington Streets  
Columbia, SC 29201

William White  
Norman Lacey

Burns & Roe, Inc.  
650 Winters Avenue  
Paramus, NJ 07652

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
METROPOLITAN EDISON COMPANY )  
 )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 55

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

INTERROGATORY NO. 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.

RESPONSE

55. Licensee is developing various plans to decontaminate TMI-2. The nature of this effort necessitates a continually evolving technical plan as additional data and information are gathered, and as performance of implemented plans is assessed. To date, Licensee has begun treatment of intermediate level waste water by means of a system commonly referred to as EPICOR II. In addition, Licensee has decontaminated areas in the auxiliary and fuel handling

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buildings. Further decontamination and clean-up efforts are planned.

To the extent such documents exist, the selection of various decontamination plans are reflected in memoranda, correspondence, and notes. In addition, some of the material being provided pursuant to Interrogatory No. 54(b) also contains relevant information.

56. The following individuals and consultant/contractors took part in selecting various decontamination plans:

Michael Morrell	Metropolitan Edison Company
Richard Wilson	P. O. Box 480
Robert Arnold	Middletown, PA 17057
John DeVine	
Gilbert Staudt	
James Kunkle	
James Renshaw	
Clark Ice (since left Met-Ed/GPU)	
John Barton	
Edward Fuhrer	
Richard McGoey	
Peter Arthur	Gilbert Commonwealth
	P. O. Box 1498
	Reading, PA 19603
Ben Rusche	South Carolina Energy Research
	Institute
	Suite 620
	First National Bank
	Main & Washington Streets
	Columbia, SC 29201



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
METROPOLITAN EDISON COMPANY )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

LICENSEE'S RESPONSE TO  
INTERROGATORIES (FIRST SET) OF  
THREE MILE ISLAND ALERT, INC.

INTERROGATORY NO. 57

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

RESPONSE

As indicated in response to Interrogatory No. 55, Licensee's plans to decontaminate TMI-2 are continually evolving. Licensee has studied various options and presented these options to the NRC, along with Licensee's recommendation as to the preferred decontamination methods. The NRC has authorized Licensee to proceed ahead with certain aspects of the decontamination work. Other parts of the decontamination work are still being analyzed by the NRC, and future aspects of the work will be presented by Licensee to the NRC. The various alternatives are described in the material produced pursuant to Interrogatory Nos. 54(b) and 56(b).

1694 039

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
METROPOLITAN EDISON COMPANY )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-239  
(Restart)

AFFIDAVIT OF DANIEL M. SHOVLIN

Commonwealth Pennsylvania )  
County of Dauphin ) : SS

DANIEL M. SHOVLIN, being duly sworn according to law, deposes and says that he is Superintendent of Maintenance-Nuclear with Metropolitan Edison Company; that the information contained in Licensee's Responses to Interrogatory Nos. 25, 26, 27, 29, 30, 33, 34, 35, 36, 37 and 38 are true and correct to the best of his knowledge and belief.

*Daniel M. Shovlin*

Daniel M. Shovlin  
Superintendent of Maintenance-Nuclear

Sworn to and subscribed  
before me this 18 day  
of December, 1979.

*[Signature]*  
Notary Public

NOTARY PUBLIC

My Commission Expires

Reading Berks County, Pa.  
My Commission Expires 12-15-1980

1694 040

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

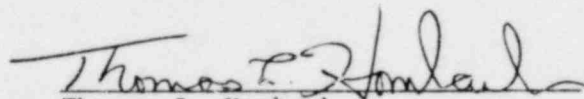
In the Matter of )  
 )  
METROPOLITAN EDISON COMPANY )  
 )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

AFFIDAVIT OF THOMAS L. HOMBACH

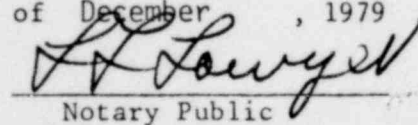
Commonwealth Pennsylvania )  
 )  
County of Dauphin ) SS

THOMAS L. HOMBACH, being duly sworn according to law, deposes and says that he is Director-Division Personnel-Administration with Metropolitan Edison Company; that the information contained in Licensee's Response to Interrogatory No 28 is true and correct to the best of his knowledge and belief.



Thomas L. Hombach  
Director-Division Personnel-Administration

Sworn to and subscribed  
before me this 18 day  
of December , 1979

  
Notary Public

NOTARY PUBLIC

Reading Berks County, Pa.  
My Commission Expires Nov. 19, 1980

My Commission expires

1694 041

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

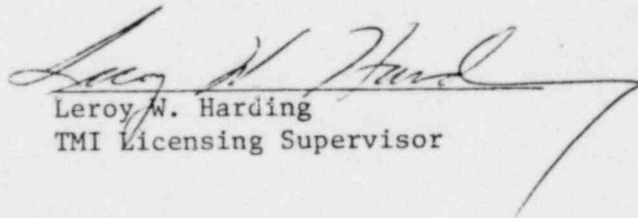
In the Matter of )  
METROPOLITAN EDISON COMPANY )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

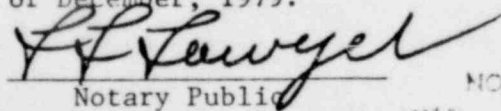
AFFIDAVIT OF LEROY W. HARDING

Commonwealth Pennsylvania )  
County of Dauphin ) : SS

LEROY W. HARDING, being duly sworn according to law, deposes and says that he is the TMI Licensing Supervisor with Metropolitan Edison Company; that the information contained in Licensee's Responses to Interrogatory Nos. 39 and 40 are true and correct to the best of his knowledge, information and belief.

  
Leroy W. Harding  
TMI Licensing Supervisor

Sworn to and subscribed  
before me this 18 day  
of December, 1979.

  
Notary Public

NOTARY PUBLIC  
Leroy W. Harding  
My Commission Expires 12/12/80

My Commission expires \_\_\_\_\_

1694 042



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
METROPOLITAN EDISON COMPANY )  
 )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

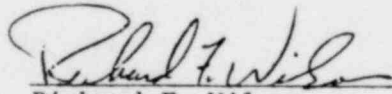
Docket No. 50-289  
(Restart)

AFFIDAVIT OF RICHARD F. WILSON

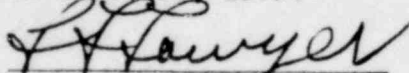
Commonwealth Pennsylvania )  
 :  
County of Dauphin )

SS

RICHARD F. WILSON, being duly sworn according to law, deposes and says that he is Director--TMI-2 with Metropolitan Edison Company; that the information contained in Licensee's Responses to Interrogatory Nos. 51, 52, 53, 54, 55, 56, and 57 are true and correct to the best of his knowledge and belief.

  
Richard F. Wilson  
Director--TMI-2

Sworn to and subscribed  
before me this 18<sup>th</sup> day  
of December, 1979.

  
Notary Public

NOTARY PUBLIC

My Commission Expires Commission Expires Nov. 19, 1983  
Berks County, Pa.

1694 043

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

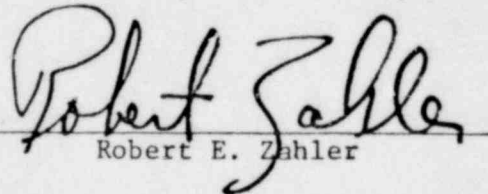
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
METROPOLITAN EDISON COMPANY )  
 )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
(Restart)

CERTIFICATE OF SERVICE

I hereby certify that copies of my December 19, 1979 letter to Theodore A. Adler, Esq., and Licensee's Response to Interrogatories (First Set) of Three Mile Island Alert, Inc., dated December 19, 1979, were served upon those persons on the attached Service List by deposit in the United States mail, postage paid, this 19th day of December, 1979.

  
Robert E. Zahler

Dated: December 19, 1979.

1694 044

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
METROPOLITAN EDISON COMPANY )  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Docket No. 50-289  
'Restart)

SERVICE LIST

Ivan W. Smith, Esquire  
Chairman  
Atomic Safety and Licensing  
Board Panel  
U. S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Dr. Walter H. Jordan  
Atomic Safety and Licensing  
Board Panel  
881 West Outer Drive  
Oak Ridge, Tennessee 37830

Dr. Linda W. Little  
Atomic Safety and Licensing  
Board Panel  
5000 Hermitage Drive  
Raleigh, North Carolina 27612

James A. Tourtellotte, Esquire  
Office of the Executive Legal  
Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

John A. Levin, Esquire  
Assistant Counsel  
Pennsylvania Public Utility  
Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17120

Karin W. Carter, Esquire  
Assistant Attorney General  
Commonwealth of Pennsylvania  
505 Executive House  
P. O. Box 2357  
Harrisburg, Pennsylvania 17120

Robert L. Knupp, Esquire  
Assistant Solicitor  
County of Dauphin  
P. O. Box P  
407 North Front Street  
Harrisburg, PA 17108

John E. Minnich  
Chairman, Dauphin County Board of  
Commissioners  
Dauphin County Courthouse  
Front and Market Streets  
Harrisburg, Pennsylvania 17101

Walter W. Cohen, Esquire  
Consumer Advocate  
Department of Justice  
14th Floor, Strawberry Square  
Harrisburg, Pennsylvania 17127

Jordan D. Cunningham, Esquire  
Attorney for Newberry Township  
T.M.I. Steering Committee  
2320 North Second Street  
Harrisburg, Pennsylvania 17110

Theodore A. Adler, Esquire  
Widoff Reager Selkowitz & Adler  
P. O. Box 1547  
Harrisburg, Pennsylvania 17105

1694 045

Ellyn Weiss, Esquire  
Sheldon, Harmon & Weiss  
Suite 506  
1725 Eye Street, N.W.  
Washington, D.C. 20006

Steven C. Sholly  
304 South Market Street  
Mechanicsburg, Pennsylvania 17055

Frieda Berryhill  
Chairman, Coalition for Nuclear  
Power Plant Postponement  
2610 Glendon Drive  
Wilmington, Delaware 19808

Holly S. Keck  
Legislation Chairman  
Anti-Nuclear Group Representing  
York  
245 West Philadelphia Street  
York, Pennsylvania 17404

Karen Sheldon, Esquire  
Sheldon, Harmon & Weiss  
Suite 506  
1725 Eye Street, N.W.  
Washington, D.C. 20006

Robert Q. Pollard  
Chesapeake Energy Alliance  
609 Montpelier Street  
Baltimore, Maryland 21218

Chauncey Kepford  
Judith H. Johnsrud  
Environmental Coalition on Nuclear Power  
433 Orlando Avenue  
State College, Pennsylvania 16801

Marvin I. Lewis  
6504 Bradford Terrace  
Philadelphia, Pennsylvania 19149

Marjorie M. Aamodt  
R. D. 5  
Coatesville, Pennsylvania 19320

Jane Lee  
R. D. 3 Box 3521  
Etters, Pennsylvania 17319