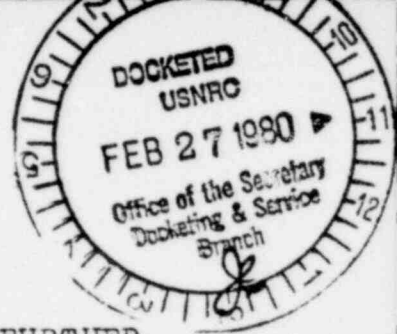


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION.

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD.

IN the matter of ) RELATED CORRESPONDENCE  
METROPOLITAN EDISON COMPANY ) Docket No. 50-289.  
(Three Mile Island , No.1) )

Intervenor Lewis's FOURTH SET OF INTERROGATORIES AND FURTHER  
DISCOVERY REQUESTS TO THE NRC STAFF.



Discovery Requests:

1. Please send a copy of NRC Translation 628(See letter from Varga to all Boards dated 1-24-80 ) in the original Japanese.)

2. Ms Barley is temporarily without a car. She requires a copy of the Rogovin Report. This report was supplied previously to intervenors. Intervenor Lewis cannot share his copy due to distance and due to the fact both people work full time jobs.

Send Ms Barley a copy of the Rogovin Report at

Susan Barley  
129 Cocoa  
Hershey PA 17033.

3. Intervenor Lewis wished to provide the Staff with Ms Barley's mailing address so that the Staff may fulfil The Board's Order of 2-13-80 ~~and~~ at the Pre Hearing Conference to add Ms Barley's name to the Staff's mailing list in this Docket:

Susan Barley  
129 Cocoa  
Hershey PA 17033.

Ms Barley requested that her name be added to the Staff's , Licensee, and Board mailings only. Ms Barley does not require that she get all the Intervenor mailings unless they specifically impinge upon the Lewis Contention.

4/ Send the Following documents:

Regulatory Guide 1.52  
ANSI 510-1975

8008310041

2

Intervenor Lewis's FOURTH SET OF INTERROGATORIES TO NRC STAFF

NRC 29. The Status Report dated 1-11-80 is much greater than the 8 1/2 x 11" size ordered by the Board in its First Prehearing Conference. Intervenor Lewis does not remember Staff objected to that size at the time Chairman Smith specified it.

Obviously, the Staff received permission to use other than 8 1/2 x 11" from the Board. The Staff would not break or ignore a Board Order unilaterally.

Nonetheless, Intervenor Lewis has seen no guidance concerning new sizes of paper for submittals which are now allowed.

Since Intervenor Lewis has very limited filing space, he requires to know what sizes of paper to expect from Staff in their filings.

What sizes of paper will staff use in their future filings specifically with reference to Status Reports?

NRC 30. Has some means been promoted for the NRC to obtain anonymous tips from informants as to practices on the construction and maintenance of the TMI#1 facility?

This concern is ~~ex~~ especially pertinent to the Lewis Contention as the filters and vent header are deep within the facility and any adverse handling or practices would not easily be reported without the threat of anonymous tips.

Please note that the problems ~~of~~ Westinghouse Turbine Cracking (Varga:Knight:80, ~~16x~~ 1,16.) and concrete problems at Wolf Creek and Summer were also brought to light thru anonymous tips.

NRC 31. The letters NRC /TMI 80-028 and Eisenhut:All Power Reactor Licensees -80.01.29) raise several issues which are explored in the following interrogatories.

A. What provisions, if any, are presently in place to guarantee that the requirements specified in Eisenhut:All Power Reactor Licensees-80.01.29 can be met?

Answer with specificity for delay and decay tank bottoms, spent charcoal and HEPA filter media pertinent to the Lewis Contention.

B. What guarantees are in place to assure that spent filter media can be moved off site to appropriate low level waste sites? Are LLW sites available now and in the future?

C. Referring to Kemeny Report, Page 30, Item 11.

"Iodine filters in the auxiliary and fuel handling buildings did not perform as designed because the charcoal filtering capacity was apparently partially expended due to improper use before the accident. Required testing ~~for~~ of filter effectiveness for the fuel handling building had been waived by the NRC. There were no testing requirements to verify auxiliary building filter effectiveness."

C-1 What was "the improper use" referred to in the quote above from the Kemeny Commission? Give type of use; dates; who authorized; where written authorizations, such as logs, work or job tickets, proper paperwork stored? ~~xxx~~ Send copies if not in an easily accessible public reading room, of all supporting documents referred to in ~~this~~ the answer to this and all interrogatories.

C-2 When, why, and how was "required testing for filter effectiveness for the fuel handling building ... waived by the NRC"? Specify names, dates, send copies of letters and any other pertinent documentation with your answer.

C-3 Considering that there were "no testing requirements to verify auxiliary building filter effectiveness", was the licensee operating in violation of 10CFR 50 Appendix A GDC 41 "Systems to control fission products... shall be provided as necessary to reduce... the concentration and quality of fission products released to the environment." GDC 60 All.

GDC 61 The fuel storage and handling, radioactive waste, and other systems which may contain radioactivity shall be designed to assure adequate safety under normal and postulated accident conditions. These systems shall be designed (1) with a capacity to permit appropriate periodic inspection and testing... (3) with appropriate containment, confinement and filtering systems."

C-4 Was the NRC knowingly allowing the Licensee to operate in violation to any GDC?

C-5 Did the NRC allow the Licensee to operate without checking the effectiveness of the filter media because there was a problem of where to get rid of the Low Level waste generated in the filtering systems? Was this a form of relief granted to the Licensee by the NRC to circumvent a LLW disposal problem? Has any form of LLW been refused at any site from TMI? If so, have the intervenors received any notification of said refusal ~~xxx~~ and why?

POOR ORIGINAL

NRC 32. Refer to NRC/TMI 80-020 ; NRC /TMI 80-022 ; and NRC News Release L-80-26 (Region 1.)

A. Is the problem described in NRC/TMI 80-020 similar for units land 2? Have all fan and filter housings been checked at both units for compatibility? When , by whom, documentations?

B. How will a drop of AB negative pressure requirements <sup>u</sup>Affect the operation of filters and filter housings if at all?

(~~Leak~~ Leak rates, condensation transfer to electrical pumps, from the surface of the filter housing, and any other pertinent changes in operating parameters.) NRC /TMI 80-022.

C. NRC News Release I-80-26 3rd Paragraph. "The releases apparently were caused by radioactive water in a water purification system ( ion exchanger) seeping past a valve and into piping normally used to carry radioactive gases to a building ~~exhaust~~ exhaust and to the plant stack." Have the filter systems and vent systems been corrected so that this event cannot be repeated at TMI#1?

If so, how so? Provide working drawings and engineering analysis.

If not, when will it be corrected? How will it be corrected?

Provide schedule and program for correcting this deficiency.

NRC 33. Supplemental Views by Members of President's Commission on the Accident at Three Mile Island on Page 12 , Commissioner Pigford states , "Although other components, systems, or features are classed as "non safety related" , they must meet requirements appropriate to their operational function."

A. What requirements applied to the filters and vent header during the day of the accident at TMI#2? Were they met?

Will the same requirements hold for TMI#1 if and when it goes back on line?

NRC 34. Letter Plesset : Aherne 80.02.11 states, " The ACRS believes that its input into this process has been largely ignored by the Commission and is concerned the the 'rush to judgment' on those important matters may result in, at worst , error and at best inefficient use of resources important to safety."

Has any input from the ACRS been factored into the TMI restart effort? Specifically, on the question of vent headers and filters. If so , provide documentation.



NRC 35. The answer to NRC 2 is not responsive; however, rather than going thru the objection route, Intervenor Lewis resubmits an expanded NRC 2 as NRC 35.

How are the answers in NRC #1 specifically going to help the filters and vent header work correctly and adequately in a repeat of March 28 accident at TMI#1?

By specifically, cite problem (leak at pump seal), how discovered (metallurgical examination by MetLab, Mr So and So) how corrected (work order, NRC approval, LER #, I&E action#) and any other facts which would provide assurance that the action was properly grounded on fact and in fact accomplished. Do this both for vent header and all filters which did not operate within expected limits. See NRC 31 C for guidance on which filters to include. State and document how this is being done on a continuing basis.

NRC 36. NRC 10 was objected to as "burden-some and improper." It was not meant to be. It is rewritten and resubmitted as

NRC 36. The Licensee has supplied everyone on the Distribution List with his answers to Lewis Interrogatories. The Staff will read (or appropriate Staffer) the Licensee's answers to Lewis Interrogatories, and answer the following:

A. Are the Licensee's answer's to Lewis Interrogatories accurate? No opinion on responsiveness is asked.

B. If any of the above answers are not accurate, would the Licensee jeopardize the health and safety of the public by implementing said inaccuracies?

NRC ~~36~~ 37. The Staff's answer to NRC 8 is not responsive in that it does <sup>not</sup> ~~not~~ give times nor state that they are unavailable. Intervenor Lewis is not objecting to this answer since he has obtained sufficient times and dates on his and his associate's researches. One question remains:

Does the Staff agree with the dates and times of releases referred to in the Rogovin and Kemeny Reports? In order to reduce the burden, the Staff need only answer for the major document and not the Staff reports. However, Intervenor Lewis reserves the right to refer to above mentioned Staff reports in direct and indirect testimony.

Intervenor Lewis's FOURTH SET OF INTERROGATORIES TO LICENSEE .

SP ~~2~~ 28. The answer to SP 2 is not responsive. No attempt is made to answer the sentence, "Include where in the Restart Report this particular pathway is eliminated or repaired." Rather than go thru the objection route, the expanded SP2 is refiled as SP 28.

- A. State which materials, filters, and items did not work as well as expected in the vent header and filters.
- B. State the page number and the paragraph number in the Restart Report where this problem is investigated.
- C. State the page number in the Restart Report where remedial action is described to eliminate each particular problem observed at TMI#2 from TMI#1 in the vent header and the filters.

The answer to SP 28 requires that page numbers be cited to be responsive.

SP 29. The Attachments for SP 5 and SP <sup>'12</sup> 12 are grossly inadequate. Intervenor Lewis sincerely hopes that these are not the size for lettering used on drawings distributed on site. The letters are so small as to be completely illegible. Resubmit working drawings as specified in SP 5 and SP ~~11~~ ~~12~~ 12 which meet the following guidelines:

Lettering shall be of such a size that the smallest letter is easily read by a person with unaided 20-20 vision.

Do not send a schematic as ~~xxxxxx~~ ~~xxxxxx~~ your entire attachment. Submit a working drawing which gives details such as ductwork, assemblies, materials and instructions to workers.

SP 30. Where did the data in SP 11 attachment A originate?

SP 31. Intervenor Lewis cannot find index to drawing in Restart Report. It may have been mislaid. Instruct Gilbert Associates to send another index of drawings in restart report to 6504 Bradford Ter. Philadelphia. PA 19149.

*10 pages deposited in US mail on 2/21/80 to  
the entire 50-289 Dist. List by William J. Lewis.*