

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20545

July 12, 1979

In Reply Refer to:
NTFTM 790712-04

Mr. George F. Trowbridge
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D. C. 20036

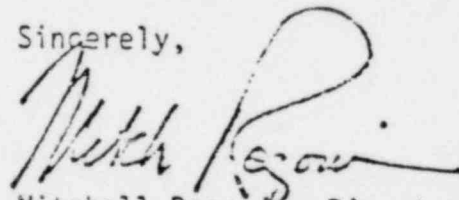
Dear Mr. Trowbridge:

This will confirm the recent conversation George Frampton and I have had with you and Ernest Blake concerning production of documents we will be seeking in the course of the Nuclear Regulatory Commission's Special Inquiry on the accident at Three Mile Island.

We will be serving you next week with a broad subpoena similar to the subpoena served on you by the President's Commission on June 4, 1979. However, we have agreed that rather than seek production of all documents covered by various subsections of this subpoena on various dates, we will instead make specific requests to you in writing for specific materials falling within the subpoena.

The first of the written requests we will be making under the subpoena is attached hereto. This request reflects the very useful conversations George and I had with Mr. Blake yesterday (July 11) at the site.

Sincerely,



Mitchell Rogovin, Director
NRC/TMI Special Inquiry Group.

Enclosure:
Request for Documents
and Information

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REQUEST FOR DOCUMENTS AND INFORMATION

NRC/TMI-2 Special Inquiry

Please provide the following documents or, where appropriate, provide in writing the information called for, on or by July 30, 1979:

1. Provide any documents reflecting the design specifications, design criteria and design bases for design of the TMI-2 control room, and any analysis, study, simulation, evaluation or test of such design, particularly with respect to the "human engineering" or "human factors" aspects of such design, including the following:
 - a. Design-related criteria, etc., that may be contained in contract documents such as contract specifications, subcontract specifications, reports on design required by the contract, and related materials.
 - b. Special Study Reports
 - o Simulations
 - o Reviews/tests
 - o Evaluations
 - c. Design Analysis
 - o Layout
 - o Component selection
 - o Arrangement of CR
 - o Operator tasks (timelines/task analyses)
 - o CR to be modelled after (if any)
 - o Environmental specifications
2. Provide the following specific equipment information:
 - a. For the Reactor Coolant Pumps and the Reactor Coolant Makeup Pumps;
 - (1) Pump-motor design specifications (speed-torque curves, name plate information, characteristics, etc.)
 - (2) Motor voltage drop calculations (pump acceleration time, etc.)
 - (3) Pump-motor environmental qualification documentation.

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2. b. For the pressurizer heater contacts, the environmental qualification documentation.
3. Provide the following information relating to the company's consideration of the nature of the "hydrogen bubble" from March 28 until approximately April 2, 1979, and the danger, if any, caused by it:
 - a. Who were the principal people within the company (including Met Ed, GPU and GPU Services) who considered and evaluated this problem?
 - b. Who were the principal people from outside the company (for example, from ESW, the NRC, or other industry personnel or consultants), if any, whose advice or assistance was sought?
 - c. What plant data were acquired or gathered together in an effort to address the problem of the bubble, and how was it acquired?
 - d. What analyses were performed and what determinations were made concerning the bubble (including its size, dangerousness, etc.), and approximately when and by whom were they made?
 - e. Provide any documents reflecting the data mentioned in (c) and (d), above, including the "bubble book."
 - f. Provide any report that has been prepared or is acquired concerning the bubble and/or the company's evaluation of the bubble.
4. With respect to the filters and filtration systems of the Auxiliary Building and the Fuel Handling Building, the Supplementary Auxiliary Exhaust Filter System, and the Reactor Purge and Control Room Filtration Units, supply results for all in-place tests that have been conducted, including startups. For the carbon in these systems, supply the laboratory test results prior to installation, and any results of testing of spent carbon. If available, supply the date tested, time in service, and service environment. Be sure to include the applicable procedures for all tests performed. If some or all of these reports and results are in the possession of a testing laboratory or any other party, please summarize what you understand is available and who should be contacted to obtain such material.

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5. Provide the following administrative and organizational information:

a. For the Met Ed Company:

1. An organizational chart of the company with occupants of position on March 28, 1979.
2. An organizational chart of the Three Mile Island plant, with occupants of positions on March 28, 1979.
3. Job descriptions of supervisory TMI plant personnel (to include down through shift foremen), including descriptions of responsibility and authority.
4. The personnel holding the positions identified in 5.a.3, above, 24 months before fuel loading; at fuel loading; and on March 28, 1979.

b. For the GPU and GPU Services Companies:

1. Organizational charts with occupants of positions on March 28, 1979.
2. Job descriptions for positions important to decisions relating to the design or operation of TMI-2.
3. The names of personnel holding positions identified in 5.b.2, above, and their qualifications for holding such positions, for the following three dates:
 - (i) 24 months before fuel loading;
 - (ii) at fuel loading; and
 - (iii) on March 28, 1979.

c. A list of all company personnel involved in the incident through April 2, 1979.

6. Provide the following information:

- a. Identify the principal company (Met Ed-GPU Services) personnel (name and position) who were in the observation center on March 28. Indicate their approximate times of arrival and, if possible, their principal functions (i.e., in-charge, estimating potential doses, interfacing with NRC, etc.).

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6. b. Identify the principal company personnel (name and position) who were in the observation center and/or members of the Met Ed-Plant Operations Group (whichever is appropriate to managing operation of the plant) from March 29 through April 16. Indicate their principal functions.
- c. Identify the principal company personnel (name and position) who were involved in providing technical support to the plant staff for March 28 through April 1 (e.g., Mr. Wilson's group that drove to the site on March 28 from the GPU Services Corporation office; Mr. Arnold's group that discussed the accident with Mr. Herbein and others, etc.)
- d. Identify the principal personnel (name, organizational affiliation and position) who were members of the GPU Technical Support Group beginning on April 2. Indicate their primary functions. Indicate which persons frequently attended meetings of the Technical Working Group.
- e. Identify the principal utility personnel (name and position) who requested support from outside organizations and individuals such as utilities, industrial groups, NSS vendors, architect-engineers. If possible, identify major requests made for such assistance on March 28 through April 1.
- f. Provide a rough organizational chart, including names, of the utility organization that was in effect for directing the outside support effort.
- g. Identify any significant differences in requesting and directing the outside support effort during the first days following the accident in comparison to the more formal organization employed after April 1, 1979.
- h. Identify the principal personnel (name, position and organizational affiliation) who were members of the Industrial Advisory Group, the Waste Management Group, the Plant Modifications Group, and the Task Management/Scheduling Group. Indicate their primary functions.
- i. Identify the principal meetings or discussions (including telephone conversations) that lead up to and/or resulted in the following decisions:
 - (1) Mr. Herbein's decision to stop discharging steam through the atmospheric dump valves at about 1400 on March 29. (Specifically, include any conversations Mr. Herbein may have had with anyone leading up to this decision.)

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- (2) Mr. Creitz's decision to have Mr. Herbein go to the site at about 900 on March 28. (Specifically, include any conversations Mr. Creitz may have had with others leading up to this decision.)
 - (3) Mr. Creitz's decision to have Mr. Herbein and others go to the Lt. Governor's office on about 1400 on March 28. (Specifically, what conversations Mr. Creitz may have had with others.)
 - (4) Mr. Herbein's decision to have Mr. Miller begin to repressurize the primary reactor coolant system on the late afternoon of March 28. (Specifically, include any conversations Mr. Arnold may have had with B&W personnel or with NRC personnel, or with other company personnel or consultants; conversations Mr. Arnold had with Mr. Herbein; and conversations Mr. Herbein had with Mr. Miller or any others leading up to this decision.)
- j. With respect to each discussion or conversation listed in item i above, summarize briefly the substance of the conversation, including any notable points covered, or any decisions reached in the conversation.
7. Provide the Touche-Ross Report submitted to the President's Commission on June 20, 1979, Document No. G/1(g)-1.
 8. Provide the materials relating to commercial operation of TMI-2 provided to the President's Commission on June 15, 1979, Document Nos. G/1(1) - 1 to 4.
 9. Provide:
 - a. The materials relating to training provided to the President's Commission on June 22, 1979 under Items III.1 (k) and III.3(d) of the Commission subpoena.
 - b. Insofar as the above materials do not cover the information listed below in this subsection, please also provide documents and/or information relating to:
 - (1) Description of the company's training program.
 - (2) Any analyses or evaluations of the training program.
 - (3) Description of the bases for and/or program for selecting or recruiting operators.
 - (4) Identify the personnel within the company primarily responsible for the development and implementation of the program for selection of operators and the program for training of operators.

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10. Make available for us to inspect at the site the materials provided to the President's Commission on June 12, 1979 relating to the history of the TMI Emergency Plan, Document Nos. G/3(e) - 1 thru 46.
11. Insofar as is possible, provide from the bulk of materials submitted to the President's Commission on June 15, relating to news releases (Document Nos. G/10) those documents reflecting press releases, statements and briefings given by company officials during the period March 28 through April 10, 1979.
12. Provide the minutes of the Plant Operations Review Committee, the General Office Review Board, and the Generation Review Committee for TMI-2. We understand that these materials have already been submitted to the President's Commission and that we can obtain copies of that submission from you.
13. The locked valve log for TMI-2.
14. The equipment out-of-service log for TMI-2.
15. A document entitled, "Plant Precautions and Limitations," apparently bearing a document designation DP 1101.1.
16. The written results of internal audits required by the technical specifications to be conducted annually, for both TMI-1 and TMI-2, and any correspondence or internal memoranda related thereto.
17. Make available for our inspection on the site operator records as follows: for all NRC-licensed personnel on the site March 28 or assigned through April 2;
 - (a) Date of license examinations, results of tests and requalification records. (We understand this material has been provided to a congressional committee and can be sent to us.)
 - (b) Training records.
 - (c) Personnel histories, including personnel evaluations, and medical and psychological records and evaluations.
18. A complete set of all transmittal letters sending material to the President's Commission both prior to and subsequent to the June 4, 1979, subpoena, and whether or not the material was transmitted under or pursuant to the subpoena.

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