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PRESIDENT'S COMMISSION ON THE :
ACCIDENT AT THREE MILE ISLAND :
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DEPOSITION of METROPOLITAN EDISON COMPANY
by BRIAN A. MEHLER, held at the Three Mile Island
Nuclear Generating Station, Harrisburg, Pennsylvania,
on the 25th day of July 1979, commencing at 4:30 p.m.,
before Stephen McCrystal, Notary Public of the State
of New York.

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2 A P P E A R A N C E S :

3 METROPOLITAN EDISON COMPANY:

4 SHAW, PITTMAN, POTTS & TROWBRIDGE, ESQS.
5 Attorneys for Metropolitan Edison Company
6 1800 M Street, NW
7 Washington, D.C.

8 BY: ALAN R. YUSPEH, ESQ.
9 of Counsel

10 PRESIDENT'S COMMISSION ON THREE MILE ISLAND:

11 JOAN GOLDFRANK, ESQ.
12 Associate Counsel

13 ALSO PRESENT:

14 CLAUDIA A. VELLETRI

15 ooo

16 B R I A N A . M E H L E R , having been
17 first duly sworn by Ms. Goldfrank, testified as
18 follows:

19 DIRECT EXAMINATION

20 BY MS. GOLDFRANK:

21 Q State your name and spell it for the
22 record, please.

23 A My name is Brian A. Mehler, B-r-i-a-n A.
24 M-e-h-l-e-r.

25 Q And your current address?

A 821 West Pajabon Drive, Palmyra, Pa.

1

Mehler

3

2

Q And your present employer?

3

A Metropolitan Edison.

4

Q And your present position?

5

A Station shift supervisor.

6

Q Have you prepared a resume?

7

A Yes, if that is what you want.

8

Q Did you prepare this resume on the date

9

July 28, 1979?

10

A Yes.

11

MS. GOLDFRANK: I would like that resume

12

marked as Mehler Exhibit 29.

13

(Above-described document was marked Mehler

14

Deposition Exhibit 29 for identification, this

15

date.)

16

Q The sheets that you attached are training

17

that you have received while at Metropolitan Edison;

18

is that correct?

19

A That is correct. The last sheet is service

20

training.

21

My jobs, see, I did in reverse.

22

MR. YUSPEH: You mean your most recent

23

first?

24

THE WITNESS: Yes.

25

Q When did you serve in the United States

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Mehler

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2 Air Force?

3 A When?

4 Q Yes.

5 A From 1959 to 1963, September 21, I believe I
6 started.

7 Q You went from high school into the United
8 States Air Force?

9 A Yes. That is the service school I attended.
10 (Indicating.)

11 Q While in the service, you had a course
12 in aircraft and missile ground support equipment
13 repairman?

14 A Yes.

15 Q And is that what you were trained to do?

16 A Yes.

17 Q And was that your job description while
18 in the Air Force?

19 A Yes.

20 Q Is this a list of the courses that you
21 took?

22 A Those subjects we had during the course, and
23 that would be the hours spent and the grades.

24 (Indicating.)

25 MS. GOLDFRANK: The witness is indicating

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2

a list of courses attached to his resume being

3

the last page of his resume.

4

Q And were you given exams in these courses?

5

A Yes.

6

Q And that is what the grade was based on?

7

A Yes, a written and an oral.

8

Q Was it a theoretical classroom instruction?

9

A And it was practical, theory and practical.

10

Q Could you explain what the division is

11

between the practical aspect of the course --

12

A Well, you had a written test, and the practical

13

was you went out and worked on the equipment itself

14

with the instructor grading you.

15

Q During the course, do you have classroom

16

instruction and practical study?

17

A Yes.

18

I also worked three years and two months in that

19

field then after I got out of that.

20

Q After you left the Air Force?

21

A No, after I left the school.

22

Q How long was the school?

23

A The school was, I think 25 weeks. I think it is

24

marked there. You can figure it out if you subtract it.

25

It is equivalent to 25 weeks, I believe.

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2 Q After your 25 weeks in school, what position
3 then did you hold in the Air Force?

4 A I was Airman Third Class, and my AFSC was 42133,
5 and from there I went on to Otis Air Force Base in
6 Massachusetts.

7 Q For a lay person, would you describe what
8 those positions were?

9 A What?

10 Q That you just described.

11 A Airman Third Class is just a rank, and the AFSC I
12 gave you would be a job description of what your
13 title was, you know, they have different levels.
14 The third level -- well, actually, the first level
15 is the lowest, the third; then the fifth, then the
16 seventh, on up. That is equivalent to the high in
17 the programming range.

18 Q What was the position that you held?

19 A At this time, the time I graduated from the
20 school, I was Airman Third Class upon graduation,
21 and then I became Airman Second Class, and when I
22 left the service, I was Airman First Class.

23 Q What were your responsibilities in those
24 respective positions?

25 MR. YUSPEH: Is it right that those are

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ranks?

3

THE WITNESS: Those are ranks.

4

5

MR. YUSPEH: And your job would vary depending on what position you were placed in at the time?

6

7

8

9

THE WITNESS: Right. None of those particular jobs have anything related to nuclear power.

10

Q To what?

11

A Nuclear power.

12

13

Q Could you generally describe what the last position you held was?

14

A In the service?

15

Q Yes.

16

17

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19

20

21

A I was Airman First Class, and I worked out of a field maintenance shop, and in that position, the last one we worked out of the shop, I more or less supervised the lower-ranking airmen in the repairs of equipment according -- I can list all the equipment if you want it.

22

Q No, that is all right.

23

A It is quite a bit.

24

25

Q And you served in the Air Force until 1963; is that correct?

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Mehler

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2 A Yes, four years.

3 Q And from 1963 to 1966, you worked at Ace
4 Aluminum Sales, correct?

5 A Yes, in Lebanon.

6 Q And your resume indicates that you worked
7 on production, repair and installation of aluminum
8 products?

9 A That is correct. Do you want to know
10 what that was?

11 Q Yes. Can you be a little more specific?

12 A Basically, all we produced was awnings, storm
13 doors, windows, et cetera. We produced them, we manu-
14 factured them, and we installed them.

15 Q In 1966, your resume reflects that you
16 worked at the Aluminum Company of America.

17 A Alcoa.

18 Q And you had that position for about a year?

19 A Yes, that is correct.

20 Q And then in May of 1967, you came to
21 Metropolitan Edison?

22 A That's right, at Crawford Generating Station.

23 Q Crawford Generating Station, and that was
24 a fossil fuel generating station?

25 A Yes, it is -- was.

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9

2 Q And your position there was a utility
3 worker "A"?

4 A Yes. That is the position everyone started at.

5 Q Your responsibilities were in the coal gang,
6 boiler room --

7 A Basically I was a utility worker. I worked in
8 the different departments, in the coal gang, and then
9 I worked in the boiler room, and then I also worked in
10 the turbine room, and the responsibilities in the
11 different departments were different. In the coal gang,
12 this was basically offloading coal or transferring coal.
13 When I worked in the boiler room, it was an assistant
14 second class in tending of the boilers, checking the
15 rotating equipment, you know, taking on coal, washing
16 ashes, et cetera.

17 In the turbine room, basically, it was the oiler
18 on the oil side, which were the oil turbines, bringing
19 them on, taking them off-line, taking care of the
20 screens -- really, it was basically labor.

21 Q And you were promoted to fireman, second
22 relief, in 1968 at Crawford Generating Station?

23 A Yes.

24 Q In October 1969, you came to Three Mile
25 Island; is that correct?

1

2 A That is correct.

3 Q And what position did you come to Three
4 Mile Island at?

5 A We came down to the Island at that particular
6 time to go into a training program that I believe
7 lasted 48 weeks, and at that time, I came down in
8 the position of a control room operator.

9 Q Did they bring a group of people from
10 Crawford Generating Station to Three Mile Island?

11 A Yes, they did.

12 Q And was Crawford Generating Station
13 closing at that time?

14 A No, it was still on the line. Crawford
15 Generating Station, I think, closed approximately
16 two or three years ago.

17 Q But Metropolitan Edison approached people
18 at Crawford Generating Station and asked them if they
19 wanted to come work --

20 A Yes, they approached people, and they gave a
21 series of tests to see if you were trainable, and
22 if you were, they offered you positions to come down
23 here with the stipulation if you didn't pass the
24 training course down here, that you would return to
25 Crawford.

1
2 Q And you took that test and passed it and
3 decided you wanted to come to Three Mile Island?

4 A Yes.

5 Q In October of 1969, what was the state
6 of Three Mile Island Unit 1?

7 A Under construction.

8 Q And you state that you entered as a control
9 room operator?

10 A Yes.

11 Q That would have been an unlicensed control
12 room operator; is that correct?

13 A That is correct.

14 Q And you went through a 48-week training
15 program as soon as you arrived at Three Mile Island?

16 A Yes.

17 Q Was that training program offered at
18 Metropolitan Edison?

19 A A training program given me by Metropolitan
20 Edison.

21 Q Did it involve any training at B&W?

22 A Not that particular set of training. Later on,
23 we went to B&W for two weeks. I forget the year.
24 Probably it was, if I had to guess, it would be '73.

25 Q But it was not part of that initial 48 weeks?

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A No, it wasn't.

Q Do you remember what that initial 48 week training session covered?

A Yes. It covered systems, half a day, which would be all the plant systems in Unit 1, and reactor theory, physics and let's see what else -- and they taught math, and that is about all I can remember off the top of my head.

Q So your day at that point was in a classroom for eight hours?

A Yes.

Q Like how many people were in that training session?

A I can take a guess.

Q Guess.

A 50.

Q 50?

A Yes. Out of that training group, though, it was AOs, CROs, Health Physics -- I don't know if there was any other departments there or not at that time.

(Continued on Page 13.)

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2 A It was a number grade.

3 Q And at the end of the 48-week course, were
4 you given an exam?

5 A Yes, but the way it was based, the pass-fail
6 grade on the weekly test, you had to have 70, and if
7 you failed, you had a week to make up plus the week
8 that you were going through. Then you had to take
9 another test on that particular subject. If you
10 failed it the second time, you went back to Crawford.

11 Q I take it you didn't fail any second time?

12 A That is where I made the mistake. I didn't have
13 to take any the second time.

14 Q Were these exams gone over with you in
15 terms of critiquing your answers, or were you just
16 given a grade?

17 A Well, we got to see the exams again, but we
18 could ask some questions on why this one was marked
19 wrong or something, but we didn't really critique
20 the exam as a whole.

21 Q And you received a control room operator's
22 license on August 8, 1974, is that correct?

23 A Yes, that is correct.

24 Q And that is a control room operator's license
25 from the then Atomic Energy Commission and now the NRC?

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SR 2 1c

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Q So this was a general basic introduction course to working on a nuclear generating station?

4

A That is correct.

5

6

Q That was given to a broad range of station people?

7

A Yes, the original group.

8

9

Q Were you given homework to do in that course?

10

A No.

11

Q Did they provide you with handouts?

12

13

14

A Yes, with system descriptions, later on operating procedures, and we did take tests every week, and I had to pass the test.

15

Q What kind of test was it -- a short answer?

16

A No, they were essay-type tests.

17

Q And you would be given --

18

19

20

21

A Well, let me say on the theory, that it was an essay-type test. Basically, on the system, it was drawing the system and answering questions, which would be a short, one-paragraph type answer.

22

Q And you were given a grade on these tests?

23

A Yes.

24

25

Q Was it a pass-fail grade, or a number grade?

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Mehler

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2 A Yes.

3 Q Did you receive any additional training
4 outside this 48-week period prior to taking the NRC
5 exam?

6 A Oh, yes.

7 Q Could you explain what that other training
8 was?

9 A We had a two-week course down at B&W. We had
10 a one-week course up at Penn State. And in the back
11 there, it will show you that we had, prior to taking
12 the exam, we had General Physics, and give us a walk-
13 around, a written test, a company-administered written
14 test, a walkaround, and we also had a multitude of
15 training during that whole period, between that 48-week
16 course and when we originally took the test.

17 ' In that period of time, we were also involved
18 in writing the procedures, alarm responses, a whole
19 multitude of things, physically checking out systems,
20 startup program.

21 Q When did Unit 1 become critical?

22 A I knew you would ask me that, '74, but I couldn't
23 tell you the date.

24 Q Well, it would be before August 8, 1974,
25 when you got your license?

1
2 A No, because I took -- we had people take cold
3 license tests that held licenses on the unit prior to
4 us taking our hot license tests. I took the reactor
5 critical for my license test, so that means that prior
6 to that, Unit 1 had to be critical.

7 Q Can you explain that to me.

8 A Okay. Essentially you are asking me --

9 Q I am trying to ascertain when Unit 1 went
10 critical.

11 A 1974 sometime, but the exact date I don't know.
12 It had to be before August 8th, for the simple reason,
13 during part of our oral test on the NRC, it was doing
14 a startup for them. I did startup on Unit 1 for my
15 license, so that means previous to that, it had to be
16 critical.

17 Q So before your NRC oral, you actually
18 did a startup on Unit 1?

19 A Yes.

20 Q Is that unusual?

21 A No, that was common practice for anyone licensed
22 in Unit 1 at the CRO level at that time. The only
23 reason they don't do it all the time is you don't
24 take a million dollar plant down and do startups.

25 Q It makes sense.

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2 Were you given mock-NRC exams prior to taking
3 your exam on August 8, 1974?

4 A Yes.

5 Q And were they given to you by Met Edison?

6 A They were given like by Met Edison and also
7 given by -- I can give you the name in here -- I
8 think there was General Physics, an outside concern.

9 Q An outside consulting company?

10 A Yes. They came in and gave us a mock; yes, it
11 was General Physics. They came us and gave us a
12 mock-oral and a written.

13 Q When you say a mock oral for you, you did
14 not go in and start up the plant?

15 A No, not at that time.

16 Q They just went over with you the kind of
17 things that probably would be asked?

18 A Basically, yes.

19 Q Did they tell you then that you would be
20 asked to start up Unit 1?

21 A We knew that.

22 Q You knew in advance that that would be the
23 case?

24 A Yes.

25 Q As I understand it, there are various parts

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Mehler

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2 to your NRC exam, correct?

3 A Yes.

4 Q And do you remember if you received above 80
5 on each part?

6 A On my original CRO test, I think there was two
7 sections I had less than 80. Don't hold me to the two
8 sections.

9 Q To the best of your recollection.

10 A Yes, it was two sections. Training could tell
11 you which two sections it was, if it was two, and
12 what the trade was.

13 Q And you don't remember which two sections?

14 A No, I don't.

15 Q Do you remember if one of those two sections
16 that you received less than 80 on, that you were
17 required to perform additional study?

18 A Yes.

19 Q And could you explain what that additional
20 study was?

21 A It was additional study given by the Training
22 Department, which required -- a required test had to
23 be done, and essentially you had to pass it with a
24 grade greater than 80.

25 Q Did you pass it with a grade greater than 80?

1

2 A Yes, or I wouldn't be here.

2

3 Q You then received a renewal of that operator's
4 license in Unit 1 on August 8, 1976?

3

5 A Yes.

5

6 Q Are operator's licenses in effect only
7 for a period of two years?

6

8 A That is correct.

8

9 Q And you have to take another exam?

9

10 A No, you don't.

10

11 Q What is the basis of the renewal?

11

12 A Just for the need.

12

13 Q You just apply, and they renew it auto-
14 matically?

13

15 A They don't have to.

15

16 Q On what grounds do they not renew it?

16

17 A Well, I couldn't tell you the answer to that.

17

18 Q All you know is that you fill out an appli-
19 cation, and in your case, they accepted the renewal?

18

20 A Yes.

20

21 Q What kind of questions do they ask on that
22 application?

21

23 A I don't believe they ask questions themselves.

23

24 It speaks of a letter. We submit this letter to them
25 saying, "Please renew," plus the application and the

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reason why, and that the person has so much training in this period of time in between, and they have the right to refuse it or to come in and test you or do whatever they want.

Q Do you know of any instance where they have refused?

A No.

Q Do you know of any instance where they have come in and re-tested somebody?

A No.

Q And as far as you know, you only submit a letter stating the training that you have had during the period that you have held your operator's license?

A Yes, and you have to take a physical.

Q During your time as a control room operator in Unit 1, from October 20, 1969 to August 23, 1976, you assisted in the initial fueling, the testing and the construction of Unit 1?

A Yes.

Q And part of your responsibilities included writing and reviewing operating, emergency and abnormal procedures and surveillance procedures?

A Yes.

Q Could you tell me what the difference is

1
2 between a surveillance procedure and an abnormal
3 procedure?

4 A Okay. It is the degree of response I believe
5 they want from you. Originally we were doing many
6 emergency procedures. It was difficult for one man
7 to memorize them all, so we took the lesser procedures that
8 we didn't consider -- what word should I use -- as
9 critical and dropped them down to a lower classification.

10 Q So an abnormal procedure is below an
11 emergency procedure, but it is not in a normal operation,
12 so it wouldn't be an operating procedure?

13 A That is correct.

14 Q And you have to memorize emergency pro-
15 cedures, but not abnormal procedures?

16 A Well, we have got to basically know the abnormal,
17 the immediate symptoms and the manual responses to them.
18 The same with emergency; it has just contradicted
19 everything I said.

20 Q You indicated earlier that you came up
21 with the term "abnormal procedure" because you felt
22 that there were too many emergency procedures for
23 people to memorize?

24 A Yes. I am still held responsible for abnormals,
25 but they probably won't look at you greatly if you

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22

2 don't know them through the nitty-gritty.

3 Q As much as emergency procedures?

4 A Yes.

5 Q Who drafted the operating procedures and
6 emergency procedures and the abnormal procedures and
7 surveillance procedures that you were concerned with
8 reviewing for Unit 1?

9 A Who wrote them?

10 Q Who did the initial drafting?

11 A The preliminaries, I think, were done -- I am
12 not sure -- I think by Gilbert.

13 (Continued on Page 23.)

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Q Gilbert Associates?

sr/ew

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A Yes, I believe so. From the preliminaries we wrote
4 the procedure.

5

Q Gilbert Associates was the architectural

6

engineer for Unit 1?

7

A Yes.

8

Q Did Gilbert Associates work closely with you?

9

A As an individual, no.

10

Q So that they would send somebody to TMI?

11

A It would come to the Island to be distributed.

12

A group might be writing procedures on a specific system.

13

Q It could come to who?

14

A It would come to the Island.

15

Q And you would then review those procedures,

16

correct?

17

A Well, out of the initial preliminary we would

18

write our own procedures, which would be much more

19

detailed.

20

Q So the preliminaries are really an outline?

21

A Basically, yes.

22

Q You then would write detailed procedures

23

based on those outlines?

24

A Yes.

25

Q Who would review those?

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2 A That particular time, I couldn't give you a
3 definite answer. I would have to assume PORC did, but
4 I wasn't in a position at that time to know if they did
5 or didn't.

6 Q All you know is you drafted a more detailed
7 procedure, and then sent it to your supervisor?

8 A Yes, and he in turn would look over it, and what
9 he did with it, I don't know. I would assume it went
10 to PORC.

11 Q In August of 1976 you were promoted to
12 shift foreman on Unit 2, is that correct?

13 A Yes.

14 Q And you held that position until April of
15 1978, is that correct?

16 A That is correct.

17 Q Was there a question that there was an
18 opening as a shift foreman on Unit 2 or whether at that
19 time just creating a staff for Unit 2?

20 A There was an opening for a shift foreman in
21 Unit 2 at that time, and they asked me if I wanted to,
22 and I took it. So that meant I left Unit 1 and went
23 to Unit 2. I went through the whole thing again.

24 Q With respect to the operating, emergency,
25 abnormal and surveillance procedures that were being

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3.3

2 drafted at that point in time for Unit 2, did Burns &
3 Roe perform the same function that Gilbert Associates
4 had in your drafting of the procedures for Unit 1?

5 A I really don't know that. Most of the procedures
6 that I was personally involved in in Unit 2, we used
7 Unit 1 procedures as a guideline.

8 Q You would use Unit 1 procedures, operating,
9 emergency, abnormal, and surveillance procedures that
10 had already been drafted and reviewed and implemented
11 for Unit 1 as a guideline?

12 A As a guideline, only as a guideline.

13 Q For Unit 2?

14 A Yes.

15 Q You didn't consider the differences in
16 Unit 1 and Unit 2?

17 A There isn't that much difference in the response.

18 Q With respect to the operating, emergency
19 and surveillance procedures, there isn't enough of a
20 difference between Unit 1 and Unit 2?

21 A In operating procedure there is. In emergency
22 procedures, basically when you talk about a reactor
23 trip and turbine trip, the responses are pretty similar.
24 You know, it is just a different value of nomenclature.

25 Q Did you use the operating procedures from

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Unit 1 as a guideline for drafting the operating procedures for Unit 2?

A I personally did myself. I can't answer for other people.

Q You did, yourself?

A I did.

Q Did Burns & Roe send you preliminary outlines, as Gilbert Associates had done in Unit 1?

A I don't know.

Q Did you ever see any?

A I honestly don't remember. I might have seen one, but I don't know. I just don't remember.

Q Do you know if you have any of these guidelines?

A From Burns & Roe?

Q Right.

A Not to my knowledge. I would assume they had to do them. Where they were sent to, I don't know, and who has them, I don't know.

Q You don't have any here?

A Myself?

Q Yes.

A No.

Q You indicated that, with respect to the

3.5

1
2 operating procedures, emergency procedures and surveil-
3 lance procedures of Unit 1 that you had helped in
4 drafting them?

5 A Yes.

6 Q That you would draft these procedures and
7 forward them to your supervisor who would be your shift
8 foreman?

9 A Yes.

10 Q And you weren't sure what happened after
11 that, but you thought it then would work its way to
12 PORC and they would review and approve these procedures?

13 A Yes. The only reason I make that statement is if
14 you look at the cover sheets on any procedure, it is
15 PORC-reviewed.

16 Q Do you know if the same procedure was imple-
17 mented in drafting or reviewing the procedures for
18 Unit 2?

19 A That same procedure was used, yes.

20 Q So that you had control room operators unde-
21 you that you worked with in drafting these procedures?

22 A The one difference between procedures in Unit 1
23 and the procedures in Unit 2, as far as the drafting of
24 them and writing them and as far as the CRO's is
25 concerned is that there was a much larger time span in

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1
2 Unit 1, and we had a lot more time to do it.

3 On Unit 2 a lot of the procedures were not written
4 by the CRO's, but they were written by the engineering
5 staff particularly because of the timing element.

6 Q In Unit 2 there was less time to draft those
7 procedures because of the time it was taking for
8 construction?

9 A Yes. Originally Unit 1 was supposed to come on
10 line in '72, and it went on line in '74, so it was a
11 two-year span where we had plenty of time to review
12 procedures, and have the CRO's make comments on them.
13 In Unit 2 that time element wasn't there.

14 Q What was the schedule in Unit 2, if you
15 can remember?

16 A I honestly don't remember. I got there in '76
17 when it went critical.

18 Q You got there in August 23, 1976, and you
19 went critical in March '78?

20 A Correct.

21 Q So that is almost a two-year period that you
22 were there, correct?

23 A Yes.

24 Q But the control room operators did not have
25 as much input in the Unit 2 drafting as they had in

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Unit 1?

A Yes.

Q But you as shift foreman in Unit 2 had input into those drafts?

A I probably had less input as a shift foreman in Unit 2 procedures than I did as a CRO in Unit 1 procedures.

Q Why was that?

A Strictly the time element. I was doing other things at that particular time, when in Unit 1 there was enough time for us to do it.

Q And because you didn't have as much time and the control room operators didn't have as much time, the task was left to the engineers?

A I would assume most of the procedures were written by the engineering staff.

Q Were those the engineers in Reading?

A Some were. I don't know if they were from Reading. Some were on-site.

Q Would they consult you as to what they were drafting?

A After they would write a procedure, they would ask us to review it.

Q Would you have to sign off on those

2 procedures?

3 A We would make our comment, nothing official like
4 signing off. We would make our comments and submit it
5 back to them, and they would either incorporate our
6 comments, or if they deemed they weren't necessary,
7 the procedures would go to PORC and be approved.

8 Q So after you in certain instances reviewed
9 these procedures, they would then be forwarded to PORC
10 for review and recommendation of approval?

11 A Yes.

12 Q You indicated that the function of time
13 did not provide you with opportunity to review or
14 draft the procedures for Unit 2. What were your main
15 responsibilities during that time?

16 A As shift foreman?

17 Q Yes.

18 A Basically we were in the startup with testing
19 programs and startup programs and also training of CRO's
20 and getting ready for that test. Pretty well we were
21 doing a lot of paperwork.

22 Q What kind of paperwork?

23 A Of switching orders, work request, going through
24 test procedures with the startup engineers, so we
25 could stay on top of that, running systems, flushing

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Mehler

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2 systems, a multitude of things.

3 Q You indicated "PORC requests." What kind of
4 things would they request?

5 A Work requests. It is simply a request to do some
6 kind of job, equipment breakdown or to replace some-
7 thing.

8 Q A work request?

9 A Yes, that is what I meant.

10 Q You also indicated that you were involved
11 in training CRO's. Were these CRO's all unlicensed
12 operators at that time?

13 A I am trying to think. They licensed the same
14 time I did.

15 Q They licensed?

16 A '76 I believe.

17 Q They would have been licensed on Unit 1?

18 A No, they weren't licensed yet. They were
19 licensed when I licensed in Unit 2.

20 Q Which would have been in October of '79?

21 A That is a misprint, I am sorry. That has to be
22 the same as this one, "77."

23 Q So they would have been licensed as control
24 room operators in October of 1977, and you received
25 your senior operator license?

- 1
- 2 A Yes.
- 3 Q So you were helping them study for and
4 prepare for their reactor operator's license?
- 5 A Basically we had the backlog.
- 6 Q So they would ask you questions and would
7 you have formal classroom sessions with them?
- 8 A No.
- 9 Q It was on-the-job questioning that they had?
- 10 A Yes.
- 11 Q And what studying did you do for your senior
12 operator license?
- 13 A On Unit 2?
- 14 Q On Unit 2, yes.
- 15 A There was also an awful lot of studying on my
16 own time.
- 17 Q Were there any classroom sessions?
- 18 A There were some classroom sessions. Most of it
19 was done before I got involved in Unit 2. The initial
20 bunch of CRO's, I believe, went to Lynchburg, Virginia
21 for a 14-week training program. I was not involved in
22 that.
- 23 Q You were not involved in that?
- 24 A No. I was getting ready for my senior test, and
25 I reviewed tests, systems, and trained for them prior

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2 to the test.

3

Q So it was a self-taught program that you went through?

4

A I would say it involved more of my time training myself than the Training Department did.

5

Q So this is studying that you did on your own time or while you were a shift foreman?

6

A On duty, sometimes. After work or sometimes during work, depending on what the workload was at that time.

7

Q So the Training Department didn't set aside a time during the day to allow you to prepare for this exam?

8

A No. Prior to the exam I think they gave us a two-week crash course.

9

Q A review course?

10

A Yes.

11

Q Of certain things they knew would be covered on the NRC exam?

12

A I wouldn't know if they knew it would be covered.

13

Q But they anticipated would be covered?

14

A Yes.

15

Q And what is the difference between the reactor operator license exam given by the NRC and the

16

#4

2 senior operator license exam given?

3 A On the written, I think the written had five more
4 sections than the CRO, and also on the oral they ask
5 more of that type of question.

6 Q Do you know what additional sections cover?

7 A I can get it for you.

8 Q If you remember.

9 A I think it is more in depth in the theory, the
10 health physics aspects of it. I believe they have
11 something on -- I know they asked about tech specs.
12 I can't think of the nomenclature for the categories.

13 Q Your resume indicates that on November 22,
14 1977 an amendment was made to your senior operator
15 license. Was that to license you on Unit 1 and 2?

16 A Yes.

17 Q So you are cross-licensed or you were in
18 November 22, 1977?

19 A Basically, but I took a test in Unit 1, and I
20 took a test in Unit 2.

21 Q Are you cross-licensed now?

22 A Yes. I hold a senior license in both units.

23 Q You had to take a senior operator license
24 for Unit 1 also?

25 A No, I didn't.

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Q Could you explain "cross-licensing"?

A Okay. Well, I can't explain cross-licensing because it is different. I can explain my situation.

Q Okay, your situation is not cross-licensing?

A No.

Q No.

A My situation is I held an CRO license for Unit 1. I also came and took a test from the NRC and got a senior license in Unit 2. The senior license portion involved basically the other five sections that are written, which are not so much in depth on that particular unit, but a general like category. So they submitted an application for waiver on my senior license to give me a license on Unit 1, to the NRC, and they amended my license and gave me, if you want to, call it cross-license, a license for both units, a senior operator license.

Q Who submitted this application to the NRC?

A Met Edison.

Q And you did not have to take the reactor operator license for Unit 2?

A I did not have to take the senior section of it, the written, no. Wait. I am sorry. Maybe we got that wrong. You said Unit 2?

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Q Right.

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A I did.

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Q Let us go back.

5

A Please.

6

Q You received a reactor operator license for

7

Unit 1?

8

A That is correct.

9

Q And then you took a senior operator license

10

exam from the NRC for Unit 2?

11

A That is correct.

12

Q And then Met Edison made an application?

13

A Right.

14

Q Which amended your senior operator license?

15

A Right.

16

Q And you want to explain to me what that

17

amendment did.

18

A What that amendment did, they gave me a senior

19

operator's license on Unit 1 also. In other words,

20

essentially my license for Unit 2 became for both units.

21

Q You never took a reactor operator license

22

exam from the NRC just for Unit 2 -- let me see if I

23

understand it. Is the exam that you take for a senior

24

operator license, does it include what you would have

25

taken for Unit 2, reactor operator license?

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2 Q If you have a senior operator license on a
3 unit, you have already passed because included in that
4 is the reactor operator license for the unit?

5 A Yes. In other words, when you take that test,
6 if you went up to senior license, and you did not do
7 as well as they want, they could award you the CRO
8 license on that unit and not give you the senior
9 license.

10 Q Can you explain to me what cross-licensing
11 is and how that differs from what you have?

12 A Cross-licensing, as far as the Island was
13 concerned, we had individuals here which had senior
14 operator license on Unit 1. They requested from the
15 NRC, when Unit 2 was started up, that could our people
16 be cross-licensed for Unit 2, but through a company-
17 administered test. The NRC agreed, and this test was
18 given, and people that passed that were issued a cross-
19 license on Unit 2.

20 I am just the same as them, except both of mine
21 were given by the NRC.

22 Q So both of your licenses are from the NRC?

23 A Yes.

24 Q Cross-license is an instance where an
25 individual would have a reactor operator license from

2 the NRC?

3 A He had SRO.

4 Q A senior operator license?

5 A From the NRC on Unit 1, and he would automatically
6 be given, if he passed a company-administered test, the
7 senior operator license for Unit 2. It would be one
8 license, but it will stipulate both units.

9 Q Would that license be amended as you have
10 indicated on your resume?

11 A Yes, their's would be an amended license also.

12 Q Do you know if the NRC reviews that
13 company-administered test?

14 A Yes.

15 Q Is it the same test that is given every
16 time? Is there one test that Met Ed administers?

17 A No.

18 Q So the NRC reviews it every time?

19 A That cross-licensing test? It is a different test
20 every time, and I could not tell you whether the NRC
21 reviews every test that is given.

22 Q Have you had any input into making up that
23 exam?

24 A No.

25 Q That is the Training Department?

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2 A That is the Training Department's responsibility.
3 It wouldn't be very fair for me to make up my own test.

4 Q Have you had to take the qualifying exams
5 from the NRC concerning these licenses?

6 A No.

7 Q Do you have to take a requalifying exam
8 from Met Edison?

9 A Yes.

10 Q How often are those given?

11 A Yearly.

12 Q And when was the last time you took one?

13 A The latter part of January or the beginning of
14 February. It was prior to Unit 1's outage.

15 Q It would be 1979, January or February of
16 1979?

17 A Yes. The Unit 1 outage started on the 16th of
18 February.

19 Q This yearly requalification exam that is
20 given by Met Edison, is that a written exam?

21 A It is a written an oral exam.

22 Q And you are given a grade on that exam or
23 a pass-fail?

24 A You are given a grade in each category, plus a
25 total grade. In other words, you could flunk one

2 category and your total average could be above an 80
3 and you would still pass.

4 Q If you received below an 80 on any of those
5 sections of that exam, are you required to do extra
6 work and take a subsequent exam?

7 A Well, you are required to do extra work and take
8 a test in that section, that category, and pass it
9 above an 80. Also, if you have I think two sections
10 less than 80, you are required -- let me see. You have
11 to be reevaluated by someone, whether they want to pull
12 you off the shift to advanced training or, you know,
13 leave you on shift and just subsequently make them up,
14 the sections, like a retest on each section and pass it.

15 Q Do you remember if you received above an
16 80 on every part?

17 A Yes. I did on the last one. They were all
18 above 80.

19 Q Did you give any input into the decision to
20 allow cross-licensing on the Island?

21 A No, I had nothing to do with that.

22 MR. YUSPEH: Off the record.

23 (There was discussion off the record.)

24 Q As I understand it, the company made a
25 decision to allow site management people from shift

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2 supervisor level to become cross-licensed, is that
3 correct?

4 A Yes.

5 Q And did you have any input into that
6 decision?

7 A No.

8 Q Do you know who made that decision?

9 A No.

10 Q Do you know why that decision was made?

11 A The decision of having a senior person on-site
12 in control of both units was strictly so you would have
13 no conflict between the units, and one person could
14 make a decision as to which unit would have priority.

15 Q So that they wanted somebody in site
16 management that would be on-site at all times or could
17 make decisions for both Unit 1 and Unit 2?

18 A That came out of the public hearings on the
19 Unit 2 licensing program, that that would happen.

20 Q It appears that in April 1979 you became
21 station supervisor, is that correct?

22 A Yes, station shift supervisor.

23 Q Station shift supervisor?

24 A Yes.

25 Q And you report to both Unit 1 supervisor of

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Mehler

42

2 operations and Unit 2 supervisor of operations?

3 A That is correct.

4 Q Prior to March 28, who was Unit 1 super-
5 visor of operations?

6 A Prior to March 28, Michael Ross.

7 Q And who was Unit 2 supervisor of operations?

8 A James Floyd.

9 Q And your responsibility as station shift
10 supervisor?

11 A That is just a general statement.

12 Q Could you explain what your responsibilities
13 are?

14 A Basically my responsibilities are that I have two
15 shift foremen in each unit working for me, to oversee
16 their duties, also to coordinate all interfaces
17 between units, just to make sure everything is running
18 smooth.

19 Q So your contact below you is with the shift
20 foremen?

21 A Shift foremen, plus also back shifts. I basically
22 have contact with all the other departments.

23 Q And do you work on a shift basis as does a
24 shift foreman?

25 A Yes.

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Mehler

43

2 Q So that you obviously are not present here
3 24 hours a day, seven days a week?

4 A No.

5 Q Is there more than one station shift super-
6 visor?

7 A There were six of us. Do you want to know how
8 many there is now or how many there was?

9 Q How many before March 28th.

10 A Six.

11 Q Are all six of those cross-licensed or have
12 licenses for both units?

13 A I don't know when Hutch got his cross-license.
14 I know five of us were at that time, and I believe the
15 sixth was also.

16 MR. YUSPEH: What is the difference
17 between supervisor of operation and unit super-
18 intendent?

19 THE WITNESS: Supervisor of operations answers
20 to the unit superintendents. The chain of command
21 basically follows station superintendent, unit
22 superintendent, () en you have supervisor of
23 operations, supervisor of maintenance, supervisor
24 of health physics. They are all department heads.

25 MR. YUSPEH: If you take the actual plant

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operation from the bottom to the top, you have your auxiliary operators, then your CRO's, then your shift foreman and shift supervisor, your supervisor of operations, and your unit superintendents and your station manager and then your vice-president of generation?

THE WITNESS: That is correct.

Q You mentioned in your resume that one of your responsibilities is to coordinate all interfaces of activity which affect both units?

A Yes.

Q Would you give me some specific examples?

A Basically it is setting priorities. In other words, we have one maintenance force. Assuming maintenance has to be done on each unit, I have to set the priority as to which unit gets it done first because basically the shift foreman would deal with his unit and would want it done first. I have to set that priority.

Also, like another interface would be transferring water between units. I would have to interface on that. Also in health physics, you know, where the priority gets set, which unit has priority over the other one.

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Q Does each unit have their own maintenance?

A No, one maintenance.

Q It is an Island operation?

A Yes, that is correct.

Q With respect to water, does each unit have their own responsibilities?

A There are cross-ties between the systems. Like in particular now for condensate, we have a tank of demineralized water that is kept filled by the Unit 1 IWT.

Q "IWT" is what?

A Water treatment system. Right now up to this date, Unit 2 did not have a demineralizing system to produce water.

Q So they would utilize Unit 1?

A Yes.

Q So you would coordinate that one?

A Yes. Basically I would tell people who had priority. Also they only have four auxiliary boilers, and if there was ever a decision which unit gets to use the auxiliary boilers for startup or shutdown, that would call upon me.

Q You attended a course at General Electric Turbine?

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Mehler

46

2 A No, that was taught by General Electric on the
3 Island. That was the Unit 1 turbine.

4 Q And the reactor familiarization?

5 A That was taught up at Penn State, which was just
6 a week.

7 Q Was that on a simulator?

8 A That was on the real TRIGA reactor.

9 Q Would they have you start up the reactor?

10 A Yes.

11 Q And do certain scenarios on it?

12 A No, not incidents up there. We basically went up
13 there to get our initial startups, to get certified for
14 NRC license. That is wrong. You are required to have
15 so many reactor startups prior to requesting an NRC
16 test on startup. Since I had no major background, that
17 was part of my program to get the startups.

18 Q And you would --

19 A I started a reactor up five times and shut it down.

20 Q Your complete experience at Pennsylvania
21 State was just the startup and shutdown?

22 A No, they gave us some formal type training. We
23 built, you know, a critical mass using graphite and rods.
24 It was just basic training.

25 Q And then you went to?

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- 2 A That was two weeks down at B&W. They gave us --
- 3 Q Simulator training?
- 4 A Yes. That was on their simulator, startup,
- 5 casualties. Basically at that particular time it was
- 6 mostly getting us ready for our test. That was prior
- 7 to '74.
- 8 Q So both the reactor training at Penn State
- 9 and the training at B&W you received prior to your
- 10 license on Unit 1?
- 11 A Yes, that is correct.
- 12 Q You had 40 hours of training at Westinghouse?
- 13 A No, that was on the Island and it was given by
- 14 Westinghouse on the Unit 2 turbine.
- 15 Q The Unit 1 turbine?
- 16 A That is GE, and Unit 2 is Westinghouse.
- 17 Q Do you know where the decision was made to
- 18 use an B&W system on Unit 2?
- 19 A B&W system on Unit 2?
- 20 Q Yes.
- 21 A Because it is identical to the one on Unit 1.
- 22 Q And do you know why the decision was made
- 23 to use a Westinghouse turbine on Unit 2?
- 24 A Compared to the GE on Unit 1?
- 25 Q Right.

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Mehler

48

2 A I really don't have the information. I know
3 basically why, but Unit 2 was supposed to be down at
4 Oyster Creek.

5 MR. YUSPEH: What would be the significance
6 of that?

7 THE WITNESS: Well, they couldn't build it
8 down there because I believe the environmental
9 people or something got it shot down. Since it
10 was already on the drawing board and was already
11 being designed, this was the most logical place
12 to set it.

13 Q They had picked a Westinghouse turbine for
14 Oyster Creek?

15 A That's right. That is also what you find where
16 you have Burns & Roe versus Gilbert.

17 MR. YUSPEH: Is Burns & Roe the architect
18 for Oyster Creek?

19 THE WITNESS: Yes. Also the architect for
20 Forked River. Originally Unit 2 was supposed to
21 be a GE unit identical to Unit 1.

22 Q A GE turbine?

23 A Originally that was the concept.

24 MR. YUSPEH: You mean a twin?

25 THE WITNESS: Yes, laid next to it.

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Q Do you know who made the decision to adopt the design from Oyster Creek?

A No, I don't have the slightest.

(A brief recess was then taken.)

Q You indicated that one of your responsibilities in your position is to interface between health physics for Unit 1 and Unit 2?

A Yes.

Q Have you received any training on the Island concerning health physics?

A Yes.

Q And would that have been classroom instruction from the Training Department?

A Yes.

Q Is that required for your position?

A Yes.

Q What has that training consisted of?

A It consisted of classroom training, testing, and also we do radiation emergency drill once a year. We also do radiation medical drill once a year. That is about it. You do get tested on it also.

Q You get written exams?

A Yes, very short.

Q How often are you required to take health

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Mehler

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2 physics courses?

3 A I think -- I am not sure, but I think it is yearly.

4 We do get a lecture on it, plus a small course after it.

5 Q Control room operators must go through a
6 training session every six weeks, I understand?

7 A Not in health physics, they don't.

8 Q The control room operators?

9 A Yes.

10 Q Do you have a similar type requirement?

11 A We are on the six-shift rotation and, you know,
12 out of the six weeks one is devoted to training.

13 Q And you would be included in that one week
14 of training?

15 A The whole shift is, yes.

16 Q You would be included in the same training
17 course that the control room operators receive?

18 A Yes.

19 Q And that is a training course offered by
20 Met Edison?

21 A That is correct.

22 Q On-site?

23 A Yes.

24 Q How often do you go to the B&W simulator?

25 A It is supposed to be yearly. Since January of

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this year I have been there four times.

Q How come you've been there four times since
January?

A I went with Unit 1 for a week. I came back and
went with Unit 2 for a week. They put me down for a
four-hour crash program, and I just came back from four
days down there.

(Continued on following page.)

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Q A four-hour crash course?

A Yes, four hours' worth on the Unit 2 accident.

Q So that you go down when Unit 1 goes down, and also you go down when Unit 2 goes down?

A That is correct.

Q With respect to training on the B&W simulator, is the control room there significantly different than the control room in Unit 1?

A Significantly? It is smaller.

Q In size?

A Oh, definitely. The controls are much smaller. The area is much more compact. They don't have as much stuff. There isn't really as much indication. It is basically showing the primary side of the plant. They have no secondary, hardly. They have a Westinghouse turbine there, with Unit 1 being GE.

Q Are the controls in the same position on the Panel?

A No. Well, let me say this. The only thing that would be basically identical to Unit 1 and Unit 2 would be the Diamond Power Control Panel, which would be your control.

Q So that the B&W control room is different also from Unit 2?

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Mehler

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2 A Yes.

3 Q It also is smaller in size than Unit 2,
4 as it was for Unit 1?

5 A Oh, yes, because Unit 2 is larger than Unit 1.

6 Q The Unit 2 control room is larger than
7 the Unit 1 control room?

8 A Yes.

9 Q Did that hinder the course on the B&W
10 simulator?

11 A No, it really doesn't hinder the course for what
12 you want to see, you know. The transient or evolution
13 of a casualty -- it would be identical as far as the
14 primary system response.

15 Q So the simulator shows you how the primary
16 system would respond, although where you would control
17 certain things, there are differences?

18 A It would be different, right.

19 Q Do they have all the same instruments
20 at the B&W simulator as are in Unit 2?

21 A No.

22 Q Do they have all the instruments that are
23 in Unit 1?

24 A No.

25 Q Did Three Mile Island ever think about

buying the same simulator?

A I don't know if they did for a fact, but I heard

talk about it a long time ago. I don't know.

Q Do you know who you heard that talk from?

A No.

Q Do you know why the decision was made not

to buy one?

A Probably the cost.

Q Do you know who would have made that

decision?

A No.

Q Have you ever made the suggestion that you

thought it would be a good idea for Three Mile Island

to have a simulator?

A No.

Q Do you think it would be?

A I don't know if we would get more out of our own

simulator, being closer, but spending more time on it

might be helpful. I don't --

Q Do you think that the training you receive

on the simulator is worthwhile?

A The training on the simulator itself is very

worthwhile. On the simulator, yes.

Q Do you think the training that you receive

2 at B&W is worthwhile?

3 A Formal classroom training?

4 Q Right.

5 A It is mediocre.

6 Q As I understand it, the week that you are
7 there, there are four hours spent in the classroom
8 each day and four on the simulator.

9 A Basically 20 hours on the simulator and 20 hours
10 in the classroom training, which really is not required.

11 Q It is not required that you attend the
12 classroom?

13 A No, it is required that you be there, but it is
14 not required that B&W give it to us. It is over and
15 above.

16 Q They are not required by what?

17 A By our agreement with them.

18 Q By your contract with B&W?

19 A Yes, right. We contract that each individual get
20 20 hours on the simulator.

21 Q So the classroom sessions are thrown in?

22 A Whatever they want to give you. Like the last
23 one, I had three times now this year.

24 Q What was that on?

25 A Heat transfer and rod withdrawal limits, and

2 the reason we got them.

3 MR. YUSPEH: Does any nuclear power plant,
4 to your knowledge, have its own simulator?

5 THE WITNESS: WPPSS out in Washington State.
6 Also, if I'm not mistaken, I think Tennessee
7 Valley Authority has their own. I'm not certain
8 of that.

9 MR. YUSPEH: Do you know if all of the other
10 three NSSS provider have at least one simulator
11 that they use?

12 THE WITNESS: I am aware that GE has a
13 simulator, but I don't know about Westinghouse.
14 I would assume they do, somewhere. The only one
15 I am familiar with is B&W.

16 (Discussion held off the record.)

17 BY MS. GOLDFRANK:

18 Q In the classroom sessions at B&W, do they
19 provide you with handouts?

20 A Yes.

21 Q But Met Edison doesn't require you to
22 attend those classroom sessions?

23 A Yes, they do require us to.

24 Q They do require you to attend?

25 A Yes.

Q Is a written exam given?

A No.

Q Is there an exam given on the simulator?

A The last time, there was. We were evaluated the last time we were down there.

Q Is that the first time?

A That is the first and only time that I know of.

Q And that would have been when you just came back last week; that is what you said?

A I think it was July 15th through the 19th, something like that.

Q That was the first time you were evaluated?

A Yes. In fact, all crews that went down were evaluated there last time by B&W.

Q Prior to that, you didn't receive any kind of grade or written evaluation?

A No. I think the very first time we were down, we had tests. The very first two weeks we went down there, which was in '73, they gave us written tests.

Q But since 1973 until this time in July 1979, you did not receive any kind of evaluation from B&W?

A No.

Q With respect to the kind of things that they would give you to do on the simulator, would they

2 give you a specific transient and let you follow
3 through as to what would happen, what you would do?

4 A Originally, you know, they would put a casualty
5 in, and you would respond to the casualty and return
6 the plant to a stable condition. Sometimes we requested
7 that instead of us responding, we would just watch the
8 casualty and see what would happen with the plant.

9 Q Without an operator doing anything?

10 A Without any response.

11 Q And that was at your request?

12 A At our request, yes.

13 Q And they would let you do that sometimes?

14 A Oh, definitely.

15 Q And when they would put in a casualty, would
16 they let you know whether or not this had happened at
17 another B&W plant, or whether this was just an invention
18 of theirs?

19 A They never specifically said it happened anywhere
20 else.

21 Q You don't remember any time that they told
22 you that this had happened somewhere else?

23 A The instructors, you know, they do come from
24 other plants, and they may have mentioned that this
25 happened at Oconee once. I do know one specific

2 incident that occurred where there was a generator
3 tube bleed, a small one that one instructor said they
4 had this previous year in Oconee, where they did
5 experience tube bleed, and this was put on the
6 simulator. They mentioned how long it took them to
7 find it.

8 Q Do you remember any other incidents that
9 they specifically mentioned had happened at other
10 B&W plants?

11 A No.

12 Q Did they ever show you multiple casualties
13 on the simulator?

14 A They have been going into it the last year,
15 multiple casualties.

16 Q The last year meaning since --

17 A January.

18 Q Since January '79?

19 A I'm trying to figure out if we had any the first
20 two times down there or not. I really don't know if
21 we went into them in the beginning every year or after
22 the accident. I do know we have gone into multiple
23 casualties down there.

24 Q But you can't remember whether or not it
25 was prior to March 28th?

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A No, I can't.

Q Do you have any contact with people at other B&W plants?

A Myself?

Q Yes.

A No.

Q Have you ever had training at other B&W plants?

A No.

Q Have you ever had training at another nuclear power plant?

A No.

(Continued on Page 60.)

sr/ew

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2 Q Have you ever had training at another
3 nuclear power plant?

4 A No.

5 Q Do you have contact with people at other
6 nuclear power plants?

7 A I know people from other nuclear power plants.

8 Q Aside from a personal relationship?

9 A No, not on a business line, although I could
10 call them and ask them a typical question if I wanted
11 to.

12 Q Have there been certain instances where you
13 have called them and asked them?

14 A No.

15 Q But you do know people at other plants that
16 you could call?

17 A I know people at WPPSS and Saabrook and Oconee
18 and I know people in Crystal River.

19 Q Are these people that you have met through
20 Three Mile Island?

21 A These people, with the exception of Crystal River
22 that worked at Three Mile Island.

23 Q That used to work at Three Mile Island and
24 now work at other plants?

25 A Also in Arizona.

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2 Q With respect to emergency and operating
3 procedures that were drafted for Unit 2, if revisions
4 are needed or somebody suggested a revision is needed?

5 A We can make an TCN or PCR. TCN is temporary
6 change notes and PCR is permanent. They in turn would
7 go through the proper channels and either be okayed or
8 not, depending on what PORC would think.

9 Q So that if a control room operator or a
10 shift foreman filled out an TCN or PCR, they would
11 forward it to you?

12 A The shift foreman wouldn't have to forward it.
13 It would not have to be forwarded to me. It could go,
14 as far as the shift foreman and then be submitted.

15 Q So a control room operator or shift foreman
16 can submit a TCN or PCR directly to PORC?

17 A No. Basically it would wind up in PORC.

18 Q What are the channels that it would work
19 its way up through?

20 A Depending on who writes it, if it is the shift
21 foreman writing it, he would submit it, and then a copy
22 would go to the PORC secretary, which in turn would
23 present it to PORC when the PORC convenes, and they
24 would either shoot it down or okay it. Then a new
25 revision would come out.

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Mehler

62

2 Q If a control room operator drafted or filed
3 a TCN or PCR?

4 A His supervisor would also have to sign it.

5 Q So a shift foreman would have to sign it?

6 A He could sign it, that is correct.

7 Q And he would then submit it to PORC?

8 A Yes.

9 Q And he submits this TCN or PCR to the PORC
10 secretary?

11 A Normally the PORC secretary will put it on the
12 agenda, and then it will go through proper channels.

13 Q Have you ever drafted or submitted a TCN
14 or PCR to PORC?

15 A Oh, yes.

16 Q Are these drafts or revisions that were
17 suggested to you by other people or that you just
18 initiated as your own?

19 A Well, a lot of times if you would be going through
20 a procedure, the simplest thing would be, where there
21 is a typographical error or a wrong number assigned, or
22 there is a new core or a new refueling and all curves
23 change in all that, that you would update it this way.
24 The original idea of putting the TCN in was to make
25 everyone aware and the PCR makes it a permanent thing.

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Q And do you make a presentation to PORC when you draft a TCN or PCR?

A No.

Q PORC reviews that TCN or PCR merely on the form and what is contained in that form?

A Yes. They have the option to call you and ask you if they want to.

Q But basically they review it based on that form?

A Right.

Q Do you know if B&W reviews any of these TCN's or PCR's?

A No, I don't know that.

(Continued on following page.)

Mehler

SM 8 1c

- 1
- 2 Q Have you ever drafted a TCN or PCR that
- 3 B&W has reviewed?
- 4 A I doubt it, no.
- 5 Q Do you have any contact with B&W personnel
- 6 on-site?
- 7 A Yes.
- 8 Q And who is that?
- 9 A Lee Rogers.
- 10 Q With anybody else?
- 11 A John Flint, Gregg Woodell -- it is not Woodell,
- 12 "Rudel" or something like that.
- 13 Q Is that all?
- 14 A Lee Rogers is the main man for B&W on-site.
- 15 There is another guy, but I can't think of his name
- 16 because I can't understand it, but there are other
- 17 people.
- 18 Q And were these people permanently on-site
- 19 prior to March 28?
- 20 A Yes. Lee Rogers has been on-site since Unit 1.
- 21 Q What kind of questions would you ask them?
- 22 A Would I ask them?
- 23 Q Yes.
- 24 A If I had a question pertaining to the primary
- 25 side of the plant where I was in doubt or needed a

2 B&W recommendation, I personally probably wouldn't
3 ask him; I would ask my boss, and he would take it
4 up the chain of command, and the answer would come
5 back down.

6 Q So you wouldn't directly take a question
7 to Lee Rogers; you would give it to your boss, who
8 would send it on through the proper channels?

9 A Yes. Maybe my boss might know the answer.

10 Q And if it was Unit 1, you would direct
11 that question to Mike Ross, or at Unit 2, to Jim Floyd?

12 A Right, or I could go to the technical superinten-
13 dent, which on Unit 2 would be George Kunder now; on
14 Unit 1, it was Bill Potts -- originally it was George
15 Kunder and Jim Seelinger, vice versa.

16 Q When you would ask a question of Lee Rogers
17 and B&W personnel on-site, are these people engineers?

18 A Yes.

19 Q And did you think that you were getting
20 the most current things in engineering?

21 A Yes, I did think that. Most of the time, Lee
22 would not give you direct answers; they would check
23 with Lynchburg.

24 Q Most of the time they would not give
25 you a direct answer; they would go back to Lynchburg

2 and check?

3 A And in turn, filter the answer back to you.

4 Q And they would give that answer back to
5 either Mike Ross or Jim Floyd?

6 A A lot of times, we were sitting in the same
7 meeting, and the answer would come out then.

8 Q Are you on any committees?

9 A No.

10 Q Do you attend staff meetings?

11 A The only meeting -- not staff meetings, no, not
12 the department head meetings at all.

13 Q What regular and standardized meetings
14 do you attend?

15 A The POD, which is the Plan of the Day. That
16 is basically the only one I attend.

17 Q Plan of the Day, the meeting that is held
18 every day?

19 A Originally the concept was it would be held
20 every day. Now it is held every other day.

21 Q Prior to March 28th, was it held every day?

22 A Yes. The reason for that is one day you would be
23 on Unit 1, and the next day you would be on Unit 2,
24 back and forth.

25 Q Who attended those meetings?

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Mehler

67

2 A The supervisor of Ops, unit superintendent, a
3 maintenance representative, an HP representative,
4 warehouse representative, QC representative, and some-
5 one from our Engineering Department for technical
6 support.

7 Q And you or a shift supervisor?

8 A Yes.

9 Q And each shift would --

10 A No, this is only done on the daylight shift.

11 Q So if you were not on the daylight shift,
12 you would not attend that meeting?

13 A That is correct.

14 Q And if you were not on the daylight shift,
15 how would you find out what was covered in that
16 meeting?

17 A We have computer printouts.

18 Q That tell you what --

19 A An agenda.

20 Q That's all?

21 A Yes. Then you make your comment on it and pass
22 it on to the next guy.

23 Q So every morning, or when you are on shift,
24 you would receive this particular printout?

25 A Normally the meeting is at nine o'clock on Unit 1,

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and Unit 2 would be 10:30..

Q So the meeting lasted for about an hour and a half?

A Yes. Sometimes they were shorter. If you are on-line, it might only last 20 minutes. Basically it is to discuss surveillance, what needs to be done, what is coming up in the next days in the future, also what the chemistry is on the primary plant, anything to do with PH, also maintenance items were broken down, what needs fixing, what has priority.

MR. YUSPEH: Who presides at the meeting?

THE WITNESS: Right now, usually it is the supervisor of OPS--usually.

Q Who was it prior to March 28th?

A The supervisor of Ops usually goes over the computer printout.

Q And how is the computer printout gotten to you?

A He brings them up.

Q He brings them up?

A He brings them up that morning, and what he goes over that morning, he will have a girl update for the next meeting.

Q When you cannot attend a meeting because

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Mehler

69

2 you are not on the day shift, how do you find out
3 what exactly was covered at that meeting, aside from
4 getting this agenda?

5 A By my relief, whoever I relieve, he tells me.

6 Q Is they always the same maintenance repre-
7 sentative, the same health physics representative?

8 A No.

9 Q Do you have people at each meeting?

10 A Yes.

11 Q Are you familiar with the computer in
12 Unit 1's control room?

13 A Yes.

14 Q Was that computer purchased and installed
15 when Unit 1 was constructed?

16 A Yes.

17 Q And what kind of computer is that?

18 A Bailey 855.

19 Q Is that the same kind of computer that
20 is in Unit 2?

21 A I don't know if it is the same thing, really.
22 They operate the same. I can get the same information
23 on it.

24 Q To the best of your knowledge?

25 A It is a Bailey 855; I am not sure. I think we

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Mehler

71

2 A Not to my knowledge, other than a little TV
3 screen that used to burn up every once in a while,
4 and you would have to fix it.

5 Q Were there concerns that the computer
6 didn't provide enough information and that is why
7 the decision was made?

8 A No, I don't think that was the reason. I don't
9 know.

10 Q Do you know who made that decision?

11 A No.

12 Q Do you know if there are concerns about
13 the 855 or 855-1/2 Bailey computer within Unit 2?

14 A I don't know if there are any concerns about it.
15 I do know it is very slow, and it is outdated.

16 Q Do you know who made the decision to pur-
17 chase that computer for Unit 2?

18 A No, I don't.

19 Q Were the modifications to the computer in
20 Unit 1 commenced prior to your purchase of the com-
21 puter in Unit 2?

22 A I couldn't tell you that; I don't know.

23 Q Do you know when the modifications to the
24 computer in Unit 1 were begun?

25 A You mean the Data 100 installed?

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Mehler

72

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Q Right.

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A I can't give you the data on it, but it was a couple of years ago.

4

5 Q Was it prior to TMI 2 becoming critical, which would be the spring of '78?

6

7 A Yes, it would have to be. I am just using my memory to see if I have ever played with it before I went to Unit 2, and I did, so it must have been.

8

9 Q Did the control room operators ever raise to you concerns about the slowness of the computer in Unit 2?

10

A No.

11

Prior to the accident or after the accident?

12

Q Yes.

13

A Prior to the accident, no.

14

15 Q Did they ever raise to you a desire to have the modifications made to the computer in Unit 2 that were made to the Unit 1 computer?

16

A No.

17

18 Q Would those types of concerns be raised with you by control room operators?

19

20 A Yes, they would voice their dissatisfaction with some of them.

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Q And it would be to you?

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A It would be to the shift foreman, myself, and even
4 sometimes the supervisor of Ops.

5

Q And would they do this on a written form?

6

A No, verbally.

7

Q Do you remember some of the concerns that

8

Unit 2 control room operators voiced to you?

9

A About the computer or about the plant?

10

Q Generally.

11

A They voiced a lot of concerns about aspects of
12 their secondary plant, the heat, noise levels down in
13 the basement around the vacuum pumps, condensate pumps,
14 et cetera. They also voiced concerns about the
15 polisher units not being quite large enough. Never
16 just specific instances, you know. I am quite sure
17 they voiced concerns over other things, but I don't
18 remember.

19

Q And this would all be done orally and not

20

in writing?

21

A Orally.

22

Q Is there standing procedure whereby they

23

can submit to you a formal concern?

24

A Not to my knowledge there isn't any.

25

Q Do you know if there was a conscious

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Mehler

70

2 have an 855-1/2, to be truthful.

3 Q An 855-1/2 in Unit 2?

4 A I think. I don't want to be held to this.

5 Q Have there been additions to the computer
6 in Unit 1?

7 A We put the Data 100 back in what used to be
8 the observation gallery. That's a much faster on-line
9 computer. It really spits the information out a lot
10 quicker, but as far as Operations using that, they
11 very seldom use it except for maybe Xenon plots or
12 startups, shutdowns, and that really is the only thing
13 that comes to mind that they really use that for.

14 Q Do you know who made the decision to make
15 that addition to the computer in Unit 1?

16 A No, I don't know who made the decision.

17 Q Do you know why the decision was made?

18 A To get more information.

19 Q To get more information?

20 A Yes.

21 Q What kind of information?

22 A More information, better availability; it is
23 quicker.

24 Q Were there problems with the computer
25 on Unit 1?

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Mehler

74

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2 decision to build the TMI 2 control room different
3 than the TMI 1 control room?

4 A No, I don't know the answer to that.

5 Q You are not aware?

6 A I am not aware of any decision -- like I said,
7 Unit 2 was designed to go somewhere else, and because
8 it was already on the drawing board and being designed,
9 they just didn't change it.

10 (A brief recess was held.)

11 DIRECT EXAMINATION (Continued)

12 BY MR. ROCKWELL:

13 Q Mr. Mehler, I would like to ask you a
14 couple of more questions about the licensing process.
15 I know I haven't been here, but I don't think these are
16 repetitive, but if they are, just say so.

17 As I understand, you are licensed on both
18 Unit 1 and Unit 2; is that correct?

19 A That is correct.

20 Q But you are not cross-licensed in the sense
21 of taking the shortcut that cross-licensing implies;
22 is that correct?

23 A That is correct.

24 Q And as I understand the shortcut that cross-
25 licensing implies --

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2 A I don't like the word "shortcut."

3 Q Let's go into that cross-licensing. When
4 one is cross-licensed, it means that one does not have
5 to take the NRC exam for the second license, correct?

6 A That is correct.

7 Q You take a Met Ed exam?

8 A That is correct, and it is audited by the NRC.

9 Q Is the Met Ed exam for a cross-licensing
10 essentially pretty much the same as an NRC exam in
11 terms of the shape of the questions and the ground
12 covered, that sort of thing?

13 A I did not take it, but from what I understand, it
14 basically follows the same format of the NRC.

15 Q Are there any other aspects of the formal
16 NRC licensing process which are eliminated when one is
17 cross-licensed as opposed to being licensed through
18 the normal NRC procedures? In other words, is there
19 anything else that you don't have to do other than not
20 take the NRC exam?

21 A Not that I can think of.

22 Q Who administers the Met Ed exam?

23 A The cross-licensing exam?

24 Q Yes.

25 A The Training Department did.

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Mehler

76

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2 Q Is each of the cross-licensing exams drawn
3 up by the Training Department approved on an exam-by-
4 exam basis by the NRC, do you know?

5 A I don't know. I know the original one was audited
6 by the NRC. The NRC came in and they went over it after
7 it was given and, in my opinion, it is a much harder
8 test than the NRC gives.

9 Q Is it?

10 A In my opinion.

11 Q Harder in what respects?

12 A I think they ask more technical questions.

13 Q Does the cross-licensing involve any
14 certificate of competence apart from the result of your
15 exam?

16 A As far as an oral type?

17 Q Of any type.

18 A No. It was just a written type exam.

19 Q And it is the written exam which is admin-
20 istered by Met Ed in the cross-licensing area?

21 A That is correct.

22 Q Is there an oral exam that is given to
23 become an operator as well --

24 A From the NRC?

25 Q Yes.

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Mehler

77

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2 A Yes, the NRC has two. They give you a written
3 plus an oral.

4 Q And in the cross-licensing area?

5 A These individuals already took a written and an
6 oral for Unit 1 from the NRC.

7 Q Right.

8 A And then, in turn, took a written company-admin-
9 istered test from the company, and it was sanctioned
10 by the NRC. They came in and audited and said, "Yes,
11 they agreed with it and it is good," and they blessed
12 them with cross-licensing.

13 Q Is there an oral exam that is also
14 administered for the cross-license?

15 A No.

16 Q So that has been eliminated?

17 A That has been eliminated. It is strictly up to
18 the NRC whether they want to administer an oral or not,
19 and they have that latitude to do it or not. Like an
20 individual could have a CRO license on Unit 1 and could
21 submit to the NRC that they want to take a CRO license
22 on Unit 2, and to my knowledge, the NRC has only come
23 in and administered the written test. They never made
24 the individual take an oral test.

25 Q Does the company require another oral exam?

2 A No.

3 Q Is there any certificate of competence that
4 is involved in the waiver of the oral exam?

5 A Not to my knowledge.

6 Q On an individual-by-individual basis?

7 A Not to my knowledge.

8 Q It is essentially a blanket waiver of the
9 oral exam in the cross-licensing area as far as you
10 know?

11 A Right. As far as I know, the NRC could have come
12 in and gave oral. There is nothing keeping them from
13 it. They optioned not to.

14 Q From what you can observe, it is just the
15 standard practice to waive the oral exam?

16 A Right. Well, this is the first time I have ever
17 come in contact with cross-licensing.

18 Q Have you ever become aware of, before the
19 28th of March, of the transient that occurred at Davis-
20 Besse on September 24, 1977?

21 A No.

22 Q Are you familiar with that now?

23 A Yes.

24 Q Had you become aware of any transient, even
25 though it wasn't specifically identified as being the

1
2 Davis-Besse transient which involved a failed open
3 PORV?

4 A No.

5 Q And the other characteristics of that
6 Davis-Besse transient?

7 A No.

8 Q Do you know what the other characteristics
9 of the Davis-Besse transient were?

10 A Basically the same thing happened at Unit 2
11 except they caught it in 28 minutes.

12 Q And showing you what has previously been
13 marked as Womack Deposition Exhibit 23. Did that --
14 and you can take a moment to look at it -- or any piece
15 of paper raising the issues addressed in that memo-
16 randum ever come to your attention before March 28,
17 1979?

18 A I didn't read the whole thing, but as far as what
19 I have read, I have never seen this before.

20 Q Had you had a chance to scan the whole
21 thing?

22 A Basically you are talking about Davis-Besse.

23 Q That is correct. But generalized concerns
24 arising out of Davis-Besse, in other words, I am taking
25 it out of the Davis-Besse context and I am asking you

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Mehler

80

2 whether those kinds of concerns ever came to your
3 attention?

4 A No, they have never. This specific has never
5 been brought to our attention.

6 Q You have been at Met Ed since 1969, is that
7 correct, or actually TMI since 1969?

8 A Yes.

9 Q When did you first become involved in
10 TMI 2?

11 A I think it was August 1976.

12 Q And at that point did you start being
13 assigned shifts on the TMI 1 control room?

14 A Yes. I started in the TMI control room on shift
15 as shift foreman.

16 Q When did you move up to shift supervisor?

17 A April 1978.

18 Q I assume you have had a chance to compare,
19 because of the range of your experience, the control
20 room in TMI 1 and the control room in TMI 2?

21 A Yes.

22 Q I know you have already gone through some
23 of the differences. What I am interested in is in your
24 impression of the effect of the design on operation and
25 on the operator working.

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Mehler

81

2 A In operator's viewpoint?

3 Q Absolutely.

4 A I am a little prejudiced because I grew up with
5 Unit 1, but basically Unit 1 is laid out a lot better.

6 Q Tell me how.

7 A Well, primary-wise you put your system pressure,
8 pressurizer level, et cetera are located closer to the
9 diamond where you would have control of a lot of stuff.
10 Your secondary systems on your steam generator side are
11 more uniform together. I don't think Unit 1's control
12 console is quite as cluttered as Unit 2's. I think
13 Unit 2, the one section of the panel is totally
14 useless to be put up front, it could have well been
15 situated farther back on another panel; it is all
16 electrical.

17 Q Which panel are you referring to?

18 A I would have been referring to console right.

19 Q Console right?

20 A Right.

21 Q Is that the low panel?

22 A Low panel.

23 Now, on that panel does have your ES gear which
24 could have been put there, but it also has all your
25 other electric on it.

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Mehler

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SM 10 1c

2 Q Any other differences that you see are
3 important from an operating sense, from a control
4 room operating sense?

5 A I think the alarms in Unit 2 are not -- too
6 many. I think there are too many of them, you know;
7 there are too many there, so the important ones are
8 lost.

9 Q Can you compare for me the number of alarms
10 in Unit 1 and Unit 2, rough estimate?

11 A I wouldn't be the one to guess. I would estimate
12 that Unit 2 probably has twice as many as Unit 1;
13 you know, that is really rough; you know, it is
14 probably more than that.

15 Q Do you know whether the operators --

16 A (Continuing.) One thing about Unit 2 is the
17 alarms are smaller, harder to read.

18 Q Do you know whether the operators here at
19 Three Mile Island became involved at all in reviewing
20 the control room design of Unit 2?

21 A The operators were not, as far as I know, and
22 this is only hearsay. The original bunch of shift
23 foremen, which are no longer on Unit 2 -- are no longer
24 on Three Mile Island, with maybe one or two exceptions--
25 were involved in some of the design as far as the layout

2 of the panels.

3 Q Who were they, to the best of your knowledge?

4 A Jerry Wallace, Ned Dirks, Alan Fredland, and I
5 can whip a couple more -- Mike Ross.

6 Q Any others?

7 A Zewe.

8 Q What kind of input did they have, do you
9 know?

10 A The originals who were there, I believe, were --
11 and I don't know because they just from talking to Al--
12 he used to be my shift foreman -- that they had input
13 on how the panels were laid out and where the controls
14 were.

15 Now, where in Unit 1 we have separation in a
16 lot of stuff, Unit 2 has a panel with all the controls
17 right there. There is no separation.

18 Q Do you know who for Met Ed was making the
19 final decisions on control room design?

20 A No.

21 Q Or for GPU?

22 A No, I don't, and I really don't know how much
23 input these individuals had.

24 Q I understand you are just giving me your
25 best impressions.

2 A Yes.

3 Q Have you had much contact over the years
4 in your job, with GPU personnel?

5 A Very little.

6 Q Have you had any contact?

7 A A few times we have had contact with maybe some
8 of the GPU people out of the Chemistry Lab, and that
9 would be just on a specific problem. Other than
10 that, up until the accident, as far as GPU, I wouldn't
11 have known half of them -- well, let me retract that
12 statement. We did have a GPU organization on the
13 Island initially for startups, which I had a lot of
14 contact with. It would have been run through Tom
15 Hawkins and those individuals, but I never considered
16 them part of GPU.

17 Q Have you had any contact with GPU
18 engineering personnel?

19 A I can't think of any I would have -- no.

20 Q You said that you had quite a bit of
21 contact with GPU in startup.

22 A They were in charge of the startup, the testing
23 program of both Unit 1 and Unit 2, initial testing
24 program.

25 Q Can you tell me a little bit about that?

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Mehler

85

2 A What the testing program is?

3 Q Yes.

4 A Basically, you know, a system is designed to
5 do a certain thing, and you wrote a procedure to
6 ensure that, and then you start the system up, you
7 know, first you do your flushes on it, you start the
8 system up, and you monitor the parameters and take
9 data and ensure that it does do what it is designed
10 to do.

11 Q When would Metropolitan Edison people
12 first have become involved in a system?

13 A We were involved in doing the evolutions under
14 their procedures.

15 Q In other words, they were directing the
16 startup procedures, and Met Ed personnel --

17 A Testing procedures.

18 Q Testing procedures -- and Met Ed personnel
19 were implementing them?

20 A Right. They would be training through the
21 operators on how the system would be run; it was under
22 their direction.

23 Q Would that basically be the first contact
24 that Met Ed operators had with the system during
25 startup?

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A Yes, as far as physical contacts. They would have had training on the system prior to that as far as classroom-type training, drawings, tracing of piping, but as far as throwing the switch and seeing water go, that would be their first contact.

Q Do you have much or any contact with Met Ed engineering personnel?

A Other than the on-site engineers up until the accident, they were the only people I had contact with.

Q Who were the only people you had contact with?

A On-site engineers.

Q And what role do the Met Ed on-site engineers play in the large picture?

A There were always technical aspects and information you need from them, and they can go in depth into the system: A lot more technical aspects of the pump design and flow curves and that, and give you technical details on it you need it.

Q Do you understand what their responsibilities are, the Met Ed on-site engineers, as opposed to GPU engineers or some other outfit's engineers?

A No, I don't know.

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Q Do you have any understanding as to what relationship Met Ed engineers have to the GPU engineering staff?

3

A No.

4

Q Are there decisions, or have there been decisions that you are aware of that are regularly sent to GPU for clearance, as opposed to being made within Met Ed, flat categories of decision?

5

A I do know during the startup phase, field questionnaires went to GPU.

6

Q What are field questionnaires?

7

A In other words, if you had a question about the system, something you didn't like or you needed verification on it, you could submit a field questionnaire, and they could have gone to Burns & Roe or GPU to get your answer back. In other words, you would think maybe there was a wiring diagram wrong or a valve placed wrong or some problem, you would submit a questionnaire on it, and that in turn would get you an answer.

8

Q What would be the handling of those questionnaires? Are they sent to one central clearing point first?

9

A They would, at that particular time, they would

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have gone into the startup trailer, and then in turn be submitted to whatever organization would handle it.

(Continued on Page 88.)

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Q You say, "Get into the startup trail"?

3

A Trailer, which would be your startup as it is.

4

Q And they would be GPU?

5

A Yes.

6

Q Was there some sort of a group that was

7

basically the watchdog and supervisory group for

8

startup, a working group?

9

A You mean, that watches the startup engineers or --

10

Q Was there some group of individuals, or

11

committee, that basically monitored and gave overall

12

direction to startup?

13

A I couldn't tell you that. I wasn't involved in

14

that.

15

Q What, in your experience as an operator

16

here at Metropolitan Edison, what methods have been

17

available and used to bring experience both here on

18

the Island and at other nuclear power plants, parti-

19

cularly power plants using Babcock & Wilcox nuclear

20

systems to the attention of operators and to integrate

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that experience into the training?

22

A Most of it would be integrated through the

23

Training Department or during the training week.

24

Q During the training what?

25

A Training week.

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Q What do you mean by the "training week"?

3

A We are basically on a six-shift rotation. One week out of that six weeks is spent in training.

4

5

Q How would that experience be integrated into the training week? How would you see it?

6

7 A Well, we would either see it through the clearing house memos, you know, we would read them, or if it was significant enough, the Training Department would give you a little course on it and bring it to your attention and tell you about it.

8

Q What are the "clearing house memos"?

9

A I forget where they come out of -- Washington.

10

MR. YUSPEH: This is the Atomic Energy Clearing House?

11

12

THE WITNESS: Yes.

13

A (Continuing.) That will tell you anything that happened.

14

15

Q You say the "Atomic Clearing House"?

16

MR. YUSPEH: The Atomic Clearing House.

17

As I understand, it is a private organization which has a publication that the company receives, and the publication summarizes major developments in the nuclear industry.

18

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Q Were those publications in their original

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form made available to the operators?

A Yes. If they wanted to go down and read them.

Q But were they automatically sent to the operators, or was it a question of the operator taking the initiative to go and read them?

Q Most of the time, they would be reviewed by the Training Department, and any significant event on them would be brought to our attention during the training week. Not everything would be significant, and sometimes nothing, and then it wouldn't be brought to their attention, but they were always down there, available if an operator wanted to go and read them.

Q How often were those memos circulated, once a month?

A I don't know.

Q Did you have any understanding of how the Training Department made decisions as to which experiences at other plants were brought to the attention of you all and which were not?

A No, I don't. I don't know how they decided that, although the people in the Training Department, the majority of them, are licensed.

Q Were there any other methods of communication by which --

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A Between plants?

Q Let me just state the question fully.

Were there any other methods of communication which were used to bring to operators' attention here, experience at other plants; either communications, for instance, originating from NRC or from private industry groups or from other utilities or from any other source?

A I do know the NRC brings bulletins out, but as far as that getting to the operator, you know, it would be on-site. Whether it got to him or not, someone would have to make the decision to send it up to the control room. But there is no formal path for it to get to him.

Q So the clearing house memos, in your experience, were the primary source that was made available directly to the operators -- obviously, some other things may have been available through the training, but in terms of the document, the clearing house memo document, those were directly available to you all; is that correct?

A They would be down in the Training Department, and if there were any significant things, the Training Department would bring it to our attention when we were there.

Q Were there any other reference materials

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Mehler

92

2 like the clearing house memos that were routinely
3 available in the Training Department for you all to
4 review if you wanted to?

5 A I don't really know.

6 Q For instance, were Licensee Event Reports
7 routinely available?

8 A Yes, they go down there also.

9 Q Are they kept in such a form that they can
10 be systematically reviewed by an operator?

11 A I can't tell.

12 Q Have you ever personally gone through
13 and browsed --

14 A No.

15 Q To your knowledge, is that something which
16 is done with any regularity by operators, to review
17 Licensee Event Reports themselves?

18 A Not to my knowledge, they don't do it.

19 You are saying on Licensee Event Reports -- we
20 do have a book up there, and I forget the title of it.
21 We do read that.

22 Q What kind of material is this? The memo
23 book in the control room?

24 A We have more than one memo book.

25 Q Tell me about it.

2 A There is also -- I am trying to think of the name
3 of the book. I can't think of the name of it -- but
4 we do have to look and read that and sign them off,
5 and I think it is incidents --

6 Q Reportable occurrences?

7 A Yes.

8 Q Is that what it is?

9 A Yes. I believe it is reportable -- yes, it is,
10 thanks.

11 Q What, in your understanding, is a reportable
12 occurrence?

13 A You want me to go into a whole dissertation?

14 Q No, just briefly.

15 A Basically, violations of tech specs, you know,
16 like a pump out of service, you know. They either
17 have to shut down, or you are violating one of your
18 heatup-cooldown curves, which is required reportable.
19 Then you have immediate notification, 30-day notifi-
20 cation, et cetera.

21 Q To the NRC?

22 A Yes.

23 Q And there is a book that contains these
24 reports of reportable occurrences?

25 A Yes.

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Q Where is that kept?

A Unit 2 control room, there is one, and there is one in Unit 1, and it would pertain to each individual station, not each unit.

Q So in other words, the Reportable Occurrence Book in the Unit 2 control room --

A -- would not have Unit 1's.

Q Just has Unit 2's reportable occurrences?

A That's right.

Q And it wouldn't have reportable occurrences from any other power plant somewhere else?

A No.

Q And it is that Reportable Occurrence Book which requires reading and signing off?

A That's right.

Q Any other memo book maintained at that control room?

A We have operator memo books.

Q Does that follow the usual procedure required, to read the entries and sign off?

A Yes. Revision --

Q Any others?

A Revision review books.

Q What are they?

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95

2 A Any procedure that had a revision done to it,
3 which, based on the Supervisor of Ops' opinion,
4 should be brought to our attention, he would have put
5 it in that book with a cover sheet. You would read
6 it and sign it off.

7 Q That is separate from the operators'
8 memo book and separate from the Reportable Occurrence
9 Book?

10 A Yes.

11 Q Are there any other books like that in the
12 control room which are updated and which operators are
13 required to read and sign off on?

14 A I don't believe so.

15 Q Are there any other sources of information,
16 let's set aside the training presentation --

17 A Your regular logs, control room logs.

18 Q Just a record?

19 A Of evolutions that happened during that shift.

20 Q We are stepping on each other's words here,
21 which I think is making it hard for the reporter to get
22 it down. I will try to wait until you finish the answer,
23 and in turn, if you could wait until I finish the question,
24 I think we will get a clear record, all right?

25 A All right.

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Mehler

96

2 Q Other than the three books that you have
3 described and the clearing house memos that are
4 available in the Training Department -- and you
5 also mentioned Licensee Event Reports that might be
6 available in the Training Department -- are there
7 any other sources of direct information outside of
8 classroom presentations that are available to control
9 room operators?

10 A You are talking about the PSARs?

11 Q No, we are still talking in the area of
12 experience.

13 A Evolution? You have your control room log
14 which PROs keep. Also, the shift foreman keeps a log.

15 Q Anything else?

16 A That's all I can think of.

17 Q That would include experience, not only
18 within your own plant, that I am referring to, but
19 experience at all other power plants?

20 A No, the log only takes the evolutions happening
21 and going on in that plant.

22 Q Let's set aside the logs for a minute.
23 What I am basically trying to find out --

24 A What happened at Toledo Edison?

25 Q Right. What sources of information do

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Mehler

97

2 you have available?

3 A That is it.

4 Q You told me the memo book may be one.

5 Reportable Occurrences would not be one because it
6 deals only with events here, right?

7 A Yes. The Clearing House would probably be it.

8 Q The Revision Review Books?

9 A Has nothing to do with it.

10 Q You have got to let me finish the ques-
11 tions, all right, so we have a clear question on the
12 record and then your response, all right?

13 A All right.

14 Q The Revision Review Books, I take it,
15 would be the indirect indication of experience to
16 the extent that one of your procedures was revised
17 on the basis of your experience somewhere else?

18 Q But it wouldn't be a direct indication to
19 you of an effect that occurred elsewhere?

20 A That is correct.

21 Q Are the Licensee Event Reports kept in a
22 systematic way in the Training Department, so that
23 you could go and review them for a particular period
24 of time or for a particular plant elsewhere?

25 A I don't know.

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Q I'm sorry, you don't know?

A I don't know. I don't know how they keep them.

Q And then in addition to that, obviously you have got classroom presentations.

A Yes.

Q Now, in the classroom presentations, would experience at other power plants, for instance, be presented in the sense of saying, "We had a transient which we wanted to discuss with you at some other plant. Here are the facts about it, and here are some things that we ought to discuss." Is it presented in that format?

A No.

Q How would experience at other plants be presented in the course of classroom training?

A I wouldn't know how they would do it unless they were informed of the experience in other plants.

Q Have you ever, in the classroom training, heard an instructor say, "Well, we just had a transient at such-and-such a place, and there are some interesting things that came out of it, and we want to make sure you are aware of it in terms of the lessons that it may teach"?

A Yes, I know what you are saying, and I can't --

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to my knowledge, it has never been presented that way.

Q Do you know from your own personal knowledge what sources of information the Training Department has available to it with respect to experience at other plants?

A Other than B&W passed them information on, or through the event reports or clearing house memos and the NRC incident reports, I don't know what other sources they would have.

Q I am showing you what was previously marked as Porter Exhibit No. 2. Let me advise you that it is my understanding that that is a publication circulated by the NRC on a periodic basis.

Are you familiar with the general format of that newsletter?

A I have seen something like this before.

Q Have you ever seen them circulated in a systematic fashion to the operators?

A I have seen them in Training, but I have never seen any formal flow path that said that every operator will see this.

Q Do you know if there is a record kept?

A I couldn't tell you that.

Q Is there a record kept of these current

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Mehler

100

2 newsletters from the NRC where someone could go and
3 review them systematically?

4 A I don't know.

5 MR. YUSPEH: Off the record.

6 (Discussion held off the record.)

7 Q Is there any system or procedure for handling
8 safety concerns here at Metropolitan Edison, other
9 than simply using the management structure, going to
10 your boss and saying, "I am concerned about something,"
11 and your boss goes up the line with your concern?

12 A In what way do you mean safety? Personnel-type
13 safety or equipment-type safety?

14 Q I am more interested in terms of safety
15 of operations of the plant.

16 A There is a safety form that you could submit a
17 form to have the Safety Department -- and that would
18 be mostly based on personnel safety, you know, on
19 unsafe to operators -- this valve, because of the
20 location, or something on the environment.

21 Q Is that related to personnel safety?

22 A I would say it would be personnel safety because
23 personnel would have to go in and operate, and he
24 is bringing up the question of the environment:

25 It is too hot.

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Q "Hot" in the sense of radiation?

3

A No, temperature-wise, or cramped quarters or something, no scaffolding or something overhead. You could submit a form to the Safety Department.

6

Q The Safety Department is concerned then primarily with personnel safety?

7

8

A Basically, yes.

9

Q Let's take safety and define it in the context of the safe operation of the plant in the sense of avoiding bad things happening when you are operating the plant, not to a particular operator, but to workmen in general. Is there a system for submitting those kinds of safety concerns?

15

A I am trying to think. Let me give you an example. There is a system, but I am trying to think what the form is, what the name of the form is to fill out.

19

Q Can you describe it?

20

A Basically, you would tell what was wrong and what you recommend wrong, and then it is submitted to, probably to my boss, and he, in turn, would take it through. It may require an engineering change or something like that.

25

Q But you can't remember the name of the

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form?

A Not a field questionnaire -- I don't really know. I forget the name of the particular form. It has been basically the same thing as a field questionnaire, which was submitted during the construction phase, a problem report or something like that. I would have to go up and pull a blank one.

Q Could you pull a blank form and supply it to us through Alan, so we could see what the form looks like?

A Yes.

Q Would that form be run through the management structure, or would it be directed to a group whose responsibility it is to review all of those forms and then make a decision as to how to handle them?

A I don't know.

Q What would you do with such a form if you had to fill it out?

A I would fill it out and submit it to my boss, and he, in turn, I would assume, would take it up through proper channels. Where it goes from there, I really don't know. If it winds up into our Engineering Evaluation Group on the Island, or if it

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Mehler

103

2 could get kicked up to Reading or kicked up to GPU --
3 I think it would have to be evaluated on the type of
4 problem that exists.

5 Q But so far as you know, there is no central
6 group here whose job it is to evaluate all such forms?

7 A Not with that specific function.

8 Q You said -- I think you used the term,
9 "Engineering Evaluation Group."

10 A Our engineering, on-site engineering group.

11 Q But is that a term that is used here,
12 "Engineering Evaluation Group"?

13 A No. We have an on-site engineering group which
14 is our Technical Support Group. I would assume they
15 would get to look at the form also if it could be
16 handled locally.

17 Q Have you ever had any contact with it,
18 in any of your years here at Metropolitan Edison,
19 with design engineers who have come in and simply talked
20 to you about the system they designed, talked to you
21 about how you, as an operator, manipulate and under-
22 stand and handle the system that they designed?

23 A No.

24 Q Have you ever had experience where personnel
25 from B&W Training Department in Lynchburg came here

2 and visited you in the control room, observed what
3 you were doing, talked to you about what you do in
4 the control room, and sort of take a first-hand look?

5 A I have talked to B&W training personnel on the
6 Island many times, strictly because I know them, but
7 whether they were here to evaluate our control room
8 and what we were doing, I couldn't answer that.

9 Q In other words, your contact with B&W
10 training personnel here on the Island would be more
11 in the nature of a personal contact?

12 A Yes. They may bring up an incident and say,
13 "Hey, what do you think about that?" But if they were
14 watching an evolution, I never got that out of it.

15 Q Have they come into the control room and
16 talked to you in the control room?

17 A Sure.

18 Q Who would be that B&W representative that
19 you had that kind of contact with?

20 A I have talked with Bill Streeter, who is no
21 longer there. I have talked to Ted Book, who is an
22 ex-shift foreman from the Island. I am trying to
23 think. The same thing with Walt Perks; he is an ex-
24 shift foreman from the Island.

25 Q Do you know whether those contacts that

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Mehler

105

2 you had with them in the control room were a conscious
3 effort on their part to come in and kind of evaluate
4 what was going on in the control room, or was it just
5 curiosity on their part?

6 A I don't know.

7 Q Have you ever had training specifically
8 addressed to the identification of a failed-open PORV?

9 A Before or after?

10 Q All my questions really are addressed to
11 before the accident.

12 A No.

13 Q There is a procedure for identifying a
14 failed-open PORV; is that correct?

15 A Basically, it is checking the temperature on the
16 outlet.

17 Q But that procedure wasn't ever specifically
18 addressed in the training program, other than the
19 fact that you were expected to read it?

20 A We were expected to know what it was in the EP.

21 Q But it was never discussed, or you never
22 did exercises on it, in terms of doing a simulated
23 exercise?

24 A At the B&W -- at the simulator?

25 Q Either there or in the training program here.

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Mehler

106

2 A I know we do go over the EPs in our training
3 program here. That specific one I am quite sure we
4 went over, but I can't recollect when. The same thing--
5 I hate to say that B&W never laid it on us down there.
6 I can't say. Normally, they left the spray valve open
7 on us.

13

8 Q What understanding did you have, again
9 speaking before the 28th of March, of how and to what
10 extent the pressurizer level should be controlled
11 within certain boundaries?

12 A You have the tech spec that says 85 inches to 385.

13 Q Under what conditions?

14 A That was operating conditions. That would be
15 with plant critical.

16 Q What about when the plant was not critical,
17 would those limits apply?

18 A They would apply when the plant was not critical,
19 but we were always trained never to take the pressurizer
20 solid except for hydros.

21 Q So your understanding up to the 28th was
22 that the limits from 85 inches to 385 inches applied
23 during a critical operation?

24 A Yes.

25 Q And then once you moved out of critical

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Mehler

107

2 operation, were there elements that applied at that
3 time to pressurizer level?

4 A No hard and fast limits, no, other than the
5 regular procedures, you know, telling you what levels
6 you should maintain, you know, during cooldown, et
7 cetera, or heatup, but it has always been drummed in
8 our heads that you should never take the pressurizer
9 solid, you know. That has been a point from Day One.

10 Q I am interested in knowing, Mr. Mehler --
11 you have said it was always drummed into your head
12 never to take the plant solid. Could you reconstruct
13 for me how that was drummed in your head and in what
14 way it was?

15 A Basically our training--from locally and from
16 B&W?

17 Q Let's take your training locally. Can
18 you identify for me whether that understanding of not
19 taking the pressurizer solid came to you in part from
20 within materials that were given to you?

21 A There is written material.

22 Q Can you identify what it is?

23 A I think in the Limits and Precautions. I am not
24 sure if it is heatup or cooldown procedure. It says
25 the pressurizer should never go solid with the makeup

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Mehler

108

2 pump running.

3 Q I am referring you now to Frederick Exhibit
4 No. 2, which is --

5 A Limits and Precautions?

6 Q Yes, Limits and Precautions, and I am
7 referring you to Page 17, which relates to pressurizer;
8 is that the limits and precautions that you had in mind?

9 A Well, that -- there is the tech spec limit there,
10 but this isn't the particular one I had in mind.

11 Q Have I got the full set here? I think
12 if there are others which you have in mind, could you
13 identify them?

14 A No, this is not the full set.

15 Q This isn't the full set?

16 A I think you will find what I am talking about
17 is in one of the operating procedures.

18 Q Do you know which one?

19 A Off the top of my head, no. I can find out.
20 It was just brought to my attention today about someone.

21 (Discussion held off the record.)

22 Q You have indicated that there may be an
23 operating procedure which gives some guidance on
24 pressurizer level, and if you can find it and bring it
25 in in the morning, I would be most appreciative.

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Mehler

109

2 A The reason you would never take it solid with
3 the makeup pump running is the system is hydro
4 originally at 3125. The discharge head of the makeup
5 pump is 3125, and if you read your tech specs out,
6 you shouldn't take it over, I think it is, 110 percent
7 of 2500.

8 Q And at 3125, that is more than 110 percent?

9 A Definitely. It is 125 percent.

10 Q And you think that operating procedure that
11 you were referring to may refer to heatup or cooldown;
12 is that correct?

13 A I think so. I will find out.

14 Q In addition to the Limits and Precautions
15 that we have just referred to as Frederick Exhibit No. 2,
16 is there other written guidance that you are aware
17 of relating to the issue of going solid or controlling
18 pressurizer level?

19 A There is other guidance on controlling pressurizer
20 level, as far as Ops on heatup and cooldown, which
21 tell you what it should be, and based on some tempera-
22 ture, but that wouldn't pertain to your line of
23 questioning.

24 Q What I am really interested in is controlling
25 pressurizer level below 385 inches, and the issue of

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when, if ever, you can go solid.

A I have never seen anything of ever taking it solid.

Q In any of your training, has there ever been any discussion of an instance where you ought to set aside the concern about going solid as being less important than doing something else?

A No. These are all pre-28th questions?

Q They all are.

You referred to the training locally here at Three Mile Island and the training at B&W. Do you have any specific recollection of training at B&W that addressed the issue of going solid?

A None. To take it solid on purpose?

Q Any training that referred to the desirability of going solid or the desirability of never going solid.

A I have never seen any training from pre-28th of ever taking it solid. In fact, all the casualties I ever had at B&W prior to March 28th never had the pressurizer go solid.

Q Did they tell you during the training at B&W never to let the pressurizer level go solid?

A I don't want to say yes or no to that because

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Mehler

111

2 I really don't -- verbally, I can never remember if
3 someone told us that. It was always implied.

4 Q It was -- I take it what you have been
5 telling me is that there was an implicit if not
6 explicit assumption and understanding on your part that
7 you never want to take it solid; is that a fair summary?

8 A That is a fair summary; that you would have a
9 problem with the pressurizer when it is solid because
10 you would be hydro-ing the system.

11 Q When you say "hydro-ing the system," are
12 you essentially --

13 A You would be taking it up to the discharge head
14 of the pump. Like I said, it would be 3125.

15 Q And when you say, "taking it up to the
16 discharge head of the pump," I take it what you mean
17 is that --

18 A The maximum pressure the pump would put out.

19 Q Can you explain for me any other reasons
20 that you know of for not taking the system solid? You
21 told me that obviously one aspect of taking it solid
22 would be possibly pressurizing the system up to 3125,
23 that is one concern. Are there any other concerns in
24 going solid, to your understanding?

25 A No.

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Mehler

112

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Q Now, obviously, in the potentiality for
3 taking the system to 3125, you have a number of relief
4 valves.

5

A Correct. The chances of getting up to that
6 pressure would be nix. You couldn't do it.

7

Q You could not do it?

8

A I don't believe so.

9

Q That assumes everything is functioning
10 normally?

11

A That is correct. The code relief lifted at 2500,
12 and the discharge wouldn't let it.

13

Q I take it your concern about going to
14 3125 pounds would relate to whether or not you
15 believed that your code safeties and your PORV would
16 bail you out?

17

A Yes.

18

Q If they would bail you out, and you can
19 be absolutely sure of that, you wouldn't be concerned,
20 would you?

21

A I am trying to figure out --

22

Q Let me ask the question a different way.

23

A I have never looked at it in that aspect, you
24 know, before, really. I always looked at it "Don't
25 go solid." That is, you know, because the

1
2 possibility exists of taking it up to the discharge
3 head of the makeup pump, you know, not saying, "Well,
4 it can never happen because the code and that will
5 bail me out.

6 Q In other words, what you are saying is
7 that you always maintain the possibility that there
8 may be a failure?

9 A It exists.

10 Q In those valves?

11 A Not only that, I wouldn't want to push all that
12 water around the place.

13 Q When you say you wouldn't want to push
14 all that water around the place, you mean even if your
15 valves worked properly, you would be shoveling an
16 awful lot of water ultimately into the contamination?

17 A Yes, just like we did.

18 Q Had your training ever specifically sug-
19 gested to you that you should always keep in mind the
20 possibility of your codes or your PORV not functioning;
21 had it specifically addressed that?

22 A Training, the only thing that may have covered
23 was maybe electromatic failed to open; that was it,
24 and it may have opened and not closed, and that would
25 be under an EP where you lost pressure or you lost

1
2 system pressure.

3 Q Had it ever specifically focussed, though,
4 on the possibility of those valves failing closed?

5 A No.

6 Q To the extent that your training focused
7 on the possibility that the electromatic valve might
8 fail open, had it done so in reference to previous
9 known failures of the PORV?

10 A I don't know if it has failed open before, you
11 know. In other words, you are saying it opened and
12 didn't close previous to the accident?

13 Q I am asking if your training --

14 A No.

15 Q About the possibility of a failed-open
16 PORV had ever been in reference to the fact that it
17 had happened before?

18 A They never referenced that it happened before.

19 Q To your knowledge, has it ever happened
20 before?

21 A Not the electromatic. I think the spray has; I
22 am not sure.

23 Q Did your training ever specifically focus
24 on telling you that any time you have a PORV lift on
25 you in a transient, that you should immediately be

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concerned about whether it has failed open?

A No.

Q That was not drilled into you as an automatic response, once you saw that it had come into operation?

A No.

MR. ROCKWELL: Let's break here.

(The deposition was adjourned at 7:40 p.m.)

Brian A. Mehler

Subscribed and sworn to
before me this ___ day
of _____, 1979.

Notary Public

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I N D E X

<u>WITNESS</u>	<u>DIRECT</u>
Brian A. Mehler	2

E X H I B I T S

<u>MEHLER DEPOSITION FOR IDENTIFICATION</u>	<u>PAGE</u>
29 Resume of Brian A. Mehler with training summaries attached	3

ooo

-----x

PRESIDENT'S COMMISSION ON THE
ACCIDENT AT THREE MILE ISLAND

-----x

CONTINUED DEPOSITION of METROPOLITAN
EDISON COMPANY by BRIAN A. MEHLER, held at the
Three Mile Island Nuclear Generating Station,
Harrisburg, Pennsylvania, on the 26th day of July
1979, commencing at 8:45 a.m., before Stanley
Rudbarg, Certified Shorthand Reporter and Notary
Public of the State of New York.

BENJAMIN REPORTING SERVICE
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NEW YORK, NEW YORK 10038

[212] 374-1138

1
2 A P P E A R A N C E S :3 METROPOLITAN EDISON COMPANY:4 SHAW, PITTMAN, POTTS & TROWBRIDGE, ESQS.
5 Attorneys for Metropolitan Edison Company
6 1800 M Street, NW
7 Washington, D. C.8
9 BY: ALAN R. YUSPEH, ESQ.
10 of Counsel11
12 PRESIDENT'S COMMISSION ON THREE MILE ISLAND:13 JOAN GOLDFRANK, ESQ.
14 Associate Chief Counsel15
16 ALSO PRESENT:

17 CLAUDIA A. VELLETRI

18
19 o0o20 (Documents described below were marked
21 Mehler Deposition Exhibits 30 through 35 for
22 identification, respectively, this date.)23 MS. GOLDFRANK: Note for the record that
24 this is the continuing deposition of Brian
25 Mehler.26 B R I A N A . M E H L E R , having been pre-
27 viously sworn, continued to testify as follows:

28 DIRECT EXAMINATION

29 BY MS. GOLDFRANK:

30 Q You have brought with you today four forms

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that we have requested yesterday, and we have marked those. Can we go through them.

The first one is entitled, "Three Mile Island Unit 2, Recovery, Burns & Roe Field Questionnaire," and is marked as Mehler Deposition Exhibit 30. This, as you indicated, was in existence prior to March 28th, and it would have been entitled the same except for the word "Recovery"?

A Yes, that is correct.

Q And for what reason would you have filled this form out?

A This form would be filled out for a problem that existed in the Burns & Roe-supplied systems, and it would be a questionnaire asking them, you know, there is a problem that exists, and they would in turn have to give us an answer.

Q Would you send this directly to Burns & Roe?

A Normally at this particular time when these were being filled out, you would turn it over to the Burns & Roe representative down in the startup trailer during the morning meeting.

Q For what period of time were these forms available?

A These forms were available during the construction

2 phase and the startup program. Right now they are
3 available again under the recovery.

4 Q But prior to March 28th, they were not
5 available after the startup?

6 A They were still in existence, but they weren't
7 being utilized.

8 Q They were available?

9 A Yes, they could have been used, yes.

10 Q Would you have given this completed form
11 to the Burns & Roe representative on-site, or would you
12 have sent it through some other channel?

13 A I would have probably handed it to my boss, and
14 he -- or else he would have told me who to give it to.

15 Q Do you know if you filled one out during
16 the period after TMI 2 startup and prior to March 28th?

17 A No, I haven't.

18 Q What we have marked as Mehler Deposition
19 Exhibit 31 is "Three Mile Island Nuclear Station GPU
20 Startup Problem Report." Could you explain what this
21 form is.

22 A That is basically the same form, but it is used
23 to present a problem more or less related to the
24 B&W-installed equipment, bring it to the attention of
25 the GPU Startup Group, where we think a problem might

2 exist and, you know, we want an answer.

3 Q And this form also was in existence for
4 the construction and startup phase?

5 A Yes, that is correct. That would have been
6 turned over at morning startup meetings.

7 Q Each morning?

8 A Each morning, we used to have a meeting with the
9 Startup Group, and the shift supervisor used to be
10 present plus Supervisor of Ops, if he was here. We
11 would go over the startup problems and submit the
12 forms, you know. Usually a Burns & Roe rep, a B&W
13 rep, a startup rep and a Met Ed rep would be there.

14 Q This form was no longer available after
15 startup?

16 A That form would not be used after startup. It
17 is available, and if you want to present the problem
18 to GPU, you could submit it to them.

19 Q How would you ensure that it
20 reached somebody in GPU? Through what channels would
21 you draft this form?

22 A I don't know.

23 Q We have marked as Mehler Deposition
24 Exhibit 32 a "Three Mile Island Nuclear Station Problem
25 Report." Could you explain what this is, please.

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A This is the form that basically can be utilized, and this form would be filled out and would be utilized through the Met Ed system. It would be presented to the personnel down in Reading. It would probably go to Mr. Klingaman.

Q And where is this form available?

A This is available in the control room, in the blank form drawer. It is very seldom utilized. I don't know if anyone has ever used this form.

Q Have you ever used this form?

A No.

Q Has it ever been explained to you what type of problems should be reported on this form?

A Not really, no.

Q Are people made aware that this form is available?

A I myself am aware of it. I don't know if the other people are. I just happen to know it is in the drawer. I don't know what procedure -- I don't even believe there is a procedure that covers that form.

Q How were you made aware of that form?

A I don't remember. I just know it is there.

Q This is a form that we have marked as Mehler Deposition Exhibit 33, which is entitled,

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"Generation Corrective Maintenance System, Job Ticket Form, Work Request, Three Mile Island," and this indicates "Unit 1." Is this a similar form?

A This is a similar form for Unit 2, and also, there is a similar form that would be systems common to both units, which would be -- I forget the letter designation, but it is just a little different. In other words, there is like cur industrial waste, which is common to both units, and you would have to use that job work request to have work done on that. It is for cost charging. This is the most common form that is used to present problems in the plant.

It is a work request. In other words, as it describes there, it says, "Describe malfunction or modification desired." If it is a malfunction, you describe what the malfunction is. If it is a modification to the system you desire, you write the modification you desire and the reasons for it. Then the rest of it, this will be submitted down to the Maintenance Department and through the normal channels, whether they need engineering evaluation, and they will take care of that.

We actually only filled out this point here.

(Indicating.)

2 Q You only fill out the top third of the
3 page?

4 A Right.

5 Q And it indicates there a spot for the
6 supervisor's signature?

7 A Yes.

8 Q Is that required?

9 A Yes. Basically, anyone can originate this
10 form, anyone in the plant, and he in turn brings it
11 to his supervisor, who, in turn, goes over the form
12 and sees if it is valid, if it is filled out properly,
13 and assigns it and then submits it.

14 Q Who is it submitted to?

15 A Normally, the flow tap would go down to the
16 Maintenance Department, down to the Supervisor of
17 Maintenance.

18 Basically, we have a basket up there that we put
19 it in, and the secretary will take it down.

20 Q On the bottom of this form, it indicates,
21 "Limits and Precautions." Who completes that?

22 A That would be completed down in the Maintenance
23 Department, by who I don't know.

24 Q Do you know if anybody else looks at it?

25 A I don't know. I do know that on certain work

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requests, depending on the type of job and the application involved, that you do have to write procedures for them, and the procedures have to be signed off by QC, and sometimes the Supervisor of Maintenance and all up the line. That is basically what this is telling you you have to do and who it all goes to. It all depends on the type of work involved.

If it is a reworking of a makeup pump, then it would be an involved procedure.

Q So depending upon the type of work it is, certain people could be consulted?

A Yes.

Q Outside of the maintenance Department?

A Oh, yes.

Q And at the very bottom of this, there are titles -- originator, supervisor, supervisor of maintenance, maintenance foreman, job performer, maintenance performer, supervisor of maintenance. Do you know what that indicates?

A I believe it is the chain of command that it would have to go through. I am only making that assumption just by looking at it. It looks to me like the guy who originates it, the guy who he sends it to, who gets it next, and on through the line, and who it is

2 returned to. I don't know if that is really what is
3 indicated, but that looks to me like what it is.

4 Q You indicated that the originator only
5 completes the top third of this form, which is the
6 portion above where he signs?

7 A That is correct.

8 Q Do you know who completes the bottom
9 portion?

10 A That would be completed down in maintenance.
11 One thing, though, there is a slot on here where, when
12 they start the work, that either the shift foreman or
13 the shift supervisor signs.

14 Q When they start the work?

15 A When they start the job, yes. That is just the
16 initials, like here, and the date.

17 Q On the second, green page?

18 A Shift foreman approval to commence work -- in
19 other words, he has ensured the system can be worked
20 on and tagged up properly.

21 Q That is, his signature is just an indication
22 that he is aware that they are going to begin work, and
23 if it requires shutting down?

24 A It should already be shut down and tagged up.
25 He is just being aware that they are commencing the

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work and that he okays it. He basically okays that they can commence the work.

Q In addition, you brought with you what we have marked as Mehler Deposition Exhibit 34, which is Revision 1, dated 11/1/77, which is an Operating Procedure.

A It is Page 5 out of an operating procedure.

Q No. 2103-1.3.

A Right. That would be pressurizer system ops.

Q And you brought this with you in response to a request that you indicate where in writing concerns with respect to pressurizer level were reflected, correct?

A That is correct.

Q And you have circled on this Deposition Exhibit 34, Section 2.1.8.

A Yes.

Q And could you explain to me why?

A I was asked yesterday if there was anywhere that I knew that told us never to take the pressurizer solid, and here, this is one of the instances where I do know it is in a procedure that tells you not to take it solid, except for hydrostatic testing, and that is basically what this Limits and Precautions says.

1
2 It says, "Pressurizer/RC system must not be filled
3 with coolant to the solid condition, 400 inches, at
4 any time except as required for system hydrostatic
5 testing."

6 Q Could you explain to me what hydrostatic
7 testing is?

8 A Hydrostatic testing is pressurizing the system
9 up to 3125 psig and testing for leaks.

10 Q And under what circumstances can you do
11 that?

12 A We initially hydro -- that is done in initial
13 startup.

14 Q That is the only time that test is per-
15 formed?

16 A That is the only time to my knowledge that it
17 is performed. It could be performed sometime later,
18 which would require permission to do it.

19 Q Under what circumstances after initial
20 fueling would you do it?

21 A I would think if we ever started Unit 2, they
22 would have us do it again.

23 Q And this Exhibit 34, Operating Procedure
24 2103-1.3, is an operating procedure for Unit 1?

25 A That is one for Unit 1, yes. (Indicating) That

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is for Unit 2. There is a "2" up there, I'm sorry.
This other one is Unit 1.

Q Deposition Exhibit 34 is for Unit 2
operating procedure?

A Yes.

Q We have marked as Mehler Deposition
Exhibit 35 an operating procedure, 1103-5, Revision 11,
dated 6/28/79. This is an operating procedure for
Unit 1?

A Yes.

Q You indicated that this revision is
dated 6/28/79, which is subsequent to the accident
at Three Mile Island Unit 2, and that this has been
changed since March 28?

A That is correct.

Q You have circled Section 8, and you indicate
that the change in that section that they added the
phrase, "Except as required by emergency procedures"?

A Yes.

Q But prior to 6/28/79, that section read
the same as Section 2.1.8 of Unit 2's Operating
Procedures?

A That is correct.

Q 2103-1.3?

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A That is correct.

Q Was it your understanding, prior to March 28th, that the Limits and Precautions should not be exceeded in a time of emergency?

A Prior to March 28th, no emergency procedure ever had you take the pressurizer solid.

Q You were trained that, pursuant to an emergency procedure, you should not take the pressurizer solid?

A Nowhere in the emergency procedure did it tell you to take it solid.

Q Were you told not to take it solid?

A No, I can't remember an incident where they physically, verbally told us not to take it solid. It was always implied.

Q It was implied, but there was no direct statement that you should not take the pressurizer level solid?

A Other than that particular one in the pressurizer ops procedure and the one in Limits and Precautions, which says not to take it over 385 inches.

Q So written in your operating procedures and in the limits and precautions, it was indicated that you should not take the pressurizer solid?

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A Yes.

Q That was discussed in your training?

A Actually discussed, per se, "Don't take it solid"?
No, I can never say that there was a specific incident
where it was actually said that way. It was always
implied that we would never take it solid.

Q But these particular sections that you
have referred to were covered in your training?

A Yes.

Q You indicated yesterday that you were
not aware of an incident at Davis-Besse 1 that
occurred in September 1977.

A Correct. That is correct. I wasn't.

Q Prior to March 28th?

A Yes.

Q Were you aware of a control room operator
at TMI that knew of the incident in September of 1977
at Davis-Besse?

A No, I wasn't.

Q Are you aware now of a control room operator
that knew of the September 24, 1977 incident at Davis-
Besse prior to March 28th?

A No, I'm not. I wouldn't know who he is.

Q Is there a requirement that hydrogen

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recombiners be available at TMI Unit 2?

A Yes.

Q There is not a similar requirement for Unit 1?

A Unit 1 does not have a hydrogen recombiner at this stage. They will have one prior to startup. Prior to that, they had a hydrogen release system, where there would be a purging of the hydrogen, rather than recombining it.

Q And where is the requirement that Unit 2 have a hydrogen recombiner?

A That is in the tech specs.

Q And do you know what that requirement states?

A Basically, that we will always have one hydrogen recombiner operable, and that it meet its testing specifications per Section, I think, 54, and it always did. That was the one that was up in the spent fuel pool.

Q On March 28th, there was one operable hydrogen recombiner in the spent fuel pool?

A Pool elevation, yes.

Q And where is the spent fuel pool elevation actually located?

2 A It is in the fuel-handling building, the recom-
3 biner. I want to get the elevation correct. I think
4 it is 333 elevation, fuel-handling building. There
5 is also another hydrogen recombiner in the Unit 2
6 warehouse.

3 7 Q Was the hydrogen recombiner in the warehouse
8 an extra one, or is it required that there be two
9 on-site?

10 A There is no requirement that we have two operable
11 hydrogen recombiners. The one in the warehouse did
12 not pass its test. We never tested it up until the
13 accident.

14 Q Was the fuel-handling building an area
15 that became contaminated on March 28th?

16 A Yes.

17 Q Could you utilize the hydrogen recombiner
18 that was located in that building on March 28th?

19 A We could not utilize it immediately. We had to
20 put a lead shield around it because of the high
21 radiation area, because of the atmosphere we were
22 drawing on in the reactor building.

23 Q When was a hydrogen recombiner utilized
24 in the course of the accident? Was it on March 28th?

25 A No, it wasn't. I'm not sure of the date. I

2 believe was either March 30th or the day after that.

3 Q Was a decision made on March 28th that
4 you needed to use a hydrogen recombiner that day?

5 A I don't know.

6 Q You were not involved in any discussions
7 concerning whether or not a hydrogen recombiner could
8 or should be used on March 28th?

9 A I don't remember, honestly.

10 Q The hydrogen recombiner that was located
11 at the fuel-handling building, that went through
12 various testing procedures pursuant to the surveillance
13 procedures?

14 A Yes.

15 Q And how frequently, pursuant to the
16 surveillance procedures, must the hydrogen recombiner
17 be tested?

18 A I don't know the actual testing frequency on it.
19 The surveillance procedure, I believe -- and this is
20 only a guess -- I think it is every six months.

21 Q And do you know what the test is that
22 is performed?

23 A It is actually running it.

24 Q Could you explain to me where actually
25 the hydrogen recombiner is hooked up?

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A Physically?

Q Right.

A Actually, it takes suction out of the reactor building in the vicinity of the purge ducts, which I have to guess on elevation again. If I had to guess, it would be the 322 elevation of the fuel-handling building. I would say it was all part of the fuel-handling building. It discharges back into the reactor building.

Q And is this hydrogen recombiner hooked up or just made available and operable?

A The spool pieces are removed during normal operation, that would be right at the vicinity of the hydrogen recombiner. That has to be put in place prior to utilizing it, to take suction off the reactor.

Q The spool piece?

A Yes.

Q Is removed?

A A spool piece is just a small piece of pipe, flanged at both ends, that fits into normal installed piping to make a complete pipe. Normally it is removed.

Q So normally the hydrogen recombiner is tested to be operable, but it is not connected up?

A It is tested taking suction out of the normal

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2 atmosphere. In other words, that blank is not
3 installed for the test. In other words, there is no
4 hydrogen for the recombiner to use, and we just have
5 to make sure it comes up through system temperature
6 and does function the way it is supposed to, so it
7 can draw normal atmosphere, which we do at that time.

8 Q So you actually don't test it in the
9 reactor building, but you test it on the normal
10 atmosphere?

11 A Right. Normally, there is no hydrogen in the
12 building.

13 Q Did you have any contact normally -- prior
14 to March 28th -- with the NRC?

15 A We have an on-site inspector, Don Habercamp.
16 We have contact with him periodically when he comes
17 in for inspections.

18 Q And is that the only --

19 A That is basically the only contact I ever had
20 with him, other than taking NRC tests.

21 Q And could you explain to me what an on-
22 site inspection encompasses, as far as you are involved?

23 A Well, as far as I am involved, Mr. Habercamp
24 could come on the Island, and he could go through
25 our operating procedures and sign off copies and ask

2 questions if he finds something that is faulty or
3 not signed off correctly or something. He could also
4 ask questions on normal operating of the plant sur-
5 veillance procedures. Also, he can make a tour of
6 the building and ask questions along the line of
7 shielding or HP-type questions, a multitude, really,
8 anything that hits his eyes that he finds and he
9 thinks is wrong that he would bring to our attention.
10 We would correct them, and he would submit a formal
11 report, depending on the magnitude of the problem.

12 Q And would you know in advance that he
13 was coming?

14 A Not always.

15 Q Sometimes he would?

16 A He would just show up.

17 Q And sometimes he would call you and let
18 you know he was coming?

19 A Well, if he showed up, he might say that he will
20 be back tomorrow, something like that. Prior to
21 Mr. Habercamp, we had two other individuals that used
22 to come on-site, and I believe one of them was Paul
23 Kelly, and another gentleman, I don't know.

24 Q How long has Mr. Habercamp been coming
25 on-site?

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Mehlar

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2 A I can only guess. I would say about a year and
3 a half or two years.

4 Q And how frequently does he come here -- a
5 guess?

6 A It is only a guess. He might show up every two
7 months or a month.

8 Q And for about the last year and a half, he
9 has consistently come about every two months?

10 A I would say that. You see, he can come in day-
11 light when I would be on the back shift, and I wouldn't
12 know he was here.

13 Q In about the last year and a half, have
14 you seen other NRC inspectors?

15 A Prior to the accident?

16 Q Right.

17 A Other than Paul Kelly and the other individual,
18 which I don't know his name, no.

19 Q Have Paul Kelly and the other inspector
20 come with Mr. Habercamp?

21 A Paul Kelly used to be in charge of this site
22 prior to Habercamp.

23 Q So Mr. Habercamp is assigned to this site?

24 A Yes. He has more than just this site.

25 Q This is one of his responsibilities?

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2 A Yes.

3 Q Once he has performed his on-site inspection

4 would he report back to you as to his findings?

5 A Not to me directly. He would report -- he
6 would have an exit meeting, which would probably be
7 with the unit superintendent and maybe the supervisor
8 of Ops, depending on what department he really looked at.

9 Q So when he would come on, he wouldn't look
10 at the same department each time?

11 A That is correct.

12 Q And the times that he would review responsi-
13 bilities that would fall within your range of responsi-
14 bility, would you be involved at that exit meeting?

15 A NO. Usually, the supervisor of Ops would.

16 Q And then the supervisor of Operations would
17 report to you?

18 A Yes. The only time I would ever discuss any-
19 thing is if he found a problem that he wanted more
20 or less solved immediately or needed some kind of
21 help or finding some kind of paperwork, he would come
22 to us. As far as his exit interviews, I have never
23 participated in any of them.

24 Q You indicated that he would review
25 operating procedures and surveillance procedures and

1
2 sometimes ask you various questions about the operations
3 of the plant. Was he always interested in the same
4 kind of questions?

5 A Not really. They were more interested in that
6 our paperwork was being done correctly and being signed
7 off correctly and looking at the surveillance procedures
8 that, yes, did meet the requirements of the surveillance
9 and that it was signed off properly.

10 Q Would these inspections by NRC -- were they
11 at all helpful to you?

12 A They did bring up certain problem areas.

13 Q In terms of how procedures were written,
14 or whether or not they met the requirements of certain
15 formal channels?

16 A Normally it wasn't in the procedure area that
17 he would find problems, except maybe a signature
18 missing on a procedure, you know, when it was completed
19 or something like that, along those lines.

20 Normally, they would find problems on the plant
21 tour with a doorknob being locked, or clothing not
22 being stored properly or something like that, along
23 those lines. They would be immediately attended to
24 and taken care of.

25 Q In what way did you think they were helpful

2 to you?

3 A Well, other than pointing out the specific
4 incidents that I mentioned, other than being helpful,
5 that would be it.

6 Q When the specific inspection involved
7 certain areas within your responsibility, and the
8 supervisor of Operations would discuss with you the
9 results of the inspection, was this an oral meeting,
10 or would he send you a written memo?

11 A Normally it was oral. In other words, I believe,
12 and I am not sure, he would have a written copy, and
13 then there would be items we would have to take
14 care of.

15 Q Did he ever show you, if he did receive,
16 a written critique from NRC? Have you ever seen one
17 of those?

18 A I don't know. I don't remember seeing one.

19 Q But you think he received something in
20 writing?

21 A Well, he probably wrote it down as they went
22 over the critique. I would assume he did.

23 Q You are not sure if those were his notes
24 or something received from NRC?

25 A That is correct.

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Mehler

143

2 Q If the NRC found in its inspection certain
3 things that it wanted corrected, would it give you a
4 time limit as to when they should be corrected?

5 A I don't know if they ever imposed time limits
6 on us.

7 Q When the supervisor of Operations reviewed
8 with you certain areas within your responsibility, did
9 he put time limits on you?

10 A We normally did them within the next shift or
11 the next day.

12 Q So you understood you should attend to it
13 right away?

14 A Normally, yes, we always did. If I was on tour
15 with him, when we found something, we would call the
16 department immediately and have it corrected.

17 Q Sometimes you would go with the NRC
18 inspector on his tour of the site?

19 A Yes, if he requested it, I have gone on tours
20 in Unit 1 with both Habercamp and Kelly.

21 Q Habercamp was inspector for both Unit 1
22 and 2?

23 A That is correct.

24 Q Could you tell me what form, prior to
25 March 28th, your contact was with Gary Miller?

2 A Gary Miller was station superintendent. My
3 contact with him is we had a meeting monthly with him.
4 He is always available to us, you know, by telephone
5 or whenever we need him. Our notes -- we always make
6 sure he gets a copy of all our notes, turnover notes.
7 When he is not on the Island, he always lets us know
8 where he is available. He always has a beeper. He
9 was always there if we needed him.

10 Q He was very accessible?

11 A Yes.

12 Q You mentioned turnover notes. Are those
13 notes that you complete during your shift and pass
14 on to the next shift supervisor?

15 A Basically what you are writing down there.
16 (Indicating.) It is a copy of the evolutions going on,
17 what we wanted accomplished and problem areas, and then
18 we would pass it on from shift to shift and from
19 supervisor to supervisor. On that particular turnover,
20 we would also have a form that we would fill out called
21 a morning report, which went to Reading. With that,
22 we would always staple on a copy of our midnight --
23 11:00 to 7:00 -- turnover notes for him. It was not
24 an official copy.

25 Q And who else would get a copy of this,

2 besides Gary Miller?

3 A Oh, supervisor of Ops; we would make sure he gets
4 a copy -- that is, of both units -- and I myself would
5 try and get one for the supervisor of Maintenance.
6 I cannot speak for the other supervisors, if they
7 did it or not. I do know that Miller always got one.
8 That is basically the individual that got it. There
9 were other individuals that requested, but they wouldn't
10 get them all the time.

11 Q They would only request them on certain
12 conditions?

13 A It all depended.

14 (Discussion held off the record.)

15 THE WITNESS: On the bottom of the Reading
16 morning report, there is a list of names, and
17 all of those individuals get a copy of the morning
18 report. I have always, myself, stapled a copy
19 of our turnover notes on that, too.

20 Q And what is the morning report?

21 A That would be the status of Unit 1 and Unit 2,
22 and that would be telecopied down to Reading.

23 Q And what type of information is that?

24 A Plant status, reactor critical, 100 percent power,
25 temperature on the codes and electromatic, major

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2 evolutions that are going on, tank levels in the primary
3 plant -- really, a short summary of the primary system
4 and the status and any major evolutions going on.

5 Q And who at Reading would this be sent to?

6 A Mr. Herbein.

7 Q Would other people receive copies of it?

8 A I couldn't tell you if they did in Reading.

9 Q You indicated that you attached to this
10 morning report a copy of your turnover notes?

11 A Right. Mr. Herbein never got a copy of the
12 turnover. He would only get the morning report.

13 Q Who would get the turnover notes that you
14 would attach to the morning report?

15 A Miller, Ross, Floyd, Kunder, Seelinger, Logan,
16 Shovlin. Like I said, I made sure they all got one.
17 I can't speak for all the other supervisors. Some
18 of them would only send it to the top -- Miller,
19 Ross, Floyd, Logan and Seelinger.

20 (Continued on Page 147.)

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2 Q So that this was your decision; it wasn't
3 requested by them or required that you hand them copies?

4 A It was not required. Some of them requested,
5 because when you turned over notes, a lot of good
6 information on the plant status and what was going
7 on, it contained.

8 Q What, prior to March 28th, was your contact
9 with Mr. Logan?

10 A Mr. Logan, prior to March 28th, was Unit 2
11 superintendent, and I would come in contact with him
12 basically in POD meeting at Unit 2, and that is about it.

13 Q So that would be every morning?

14 A Every morning we had Unit 2 POD meetings.

15 Q And if you happened not to be on shift
16 that you would attend a meeting, you normally wouldn't
17 have contact with him?

18 A That is correct.

19 Q And prior to March 28th, what was your
20 contact with Mr. Kunder?

21 A Basically the same. He would be at the POD
22 meeting, and if I needed his assistance, I would call
23 him.

24 Q Prior to March 28th, what was your contact
25 with Mr. Floyd?

2 A Pod meeting, and he would be more available in
3 the control room during my plant evolutions during the
4 daylight shift.

5 They are all available by telephone any time
6 we needed information out of their department.

7 Q All of them would be available during
8 the daylight shift?

9 A Yes, they all worked daylight.

10 Q And you indicated M. Floyd would be
11 available in the control room?

12 A Well, he had a trailer down here, but, you
13 know, he would be on-site. We could page him and
14 get him if we needed him.

15 Q Would Mr. Kunder and Mr. Logan be on-site?

16 A Yes.

17 Q In a trailer or inside the plant?

18 A They both were still in trailers, yes.

19 Q Did Mr. Floyd have an office in the plant?

20 A No.

21 Q He would just come there and wander around
22 and talk with different --

23 A He would come up to the control room and sit
24 in the shift supervisor's office.

25 Q Is that the little booth in the control room?

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Mehler

149

2 A Yes.

3 Q So he would spend much time sitting there
4 with you if you were on daylight shift?

5 A Yes. He would normally be in there.

6 Q Prior to March 28, immediately before
7 March 28, were you aware that the PORV was leaking?

8 A No.

9 Q Were you aware that there was a concern
10 that the PORV or the code safeties were leaking?

11 A Yes.

12 Q And is it correct to say that they were
13 not sure whether it was the PORV or the code safeties
14 that were leaking?

15 A That is correct.

16 Q And how would it be possible to ascertain
17 which was leaking?

18 A By checking the thermocouple, the temperatures at
19 the discharge of the valve.

20 Q Is there a thermocouple, a separate therm-
21 couple for the PORV and the two code safeties?

22 A There is a separate thermocouple for each one.

23 Q So that you could take temperature measure-
24 ments of each safety?

25 A It was a printout on the computer that you asked

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for, and that was on the morning report.

Q Do you know how soon before March 28th there was indication that there was a leak?

A I know there was an indication. Prior to March 28th, far in advance of that. I can't remember. I would say probably a month, and that is only probably a guess -- an indication that indicated it was one of the codes.

Q And why could you not ascertain which of the codes it was?

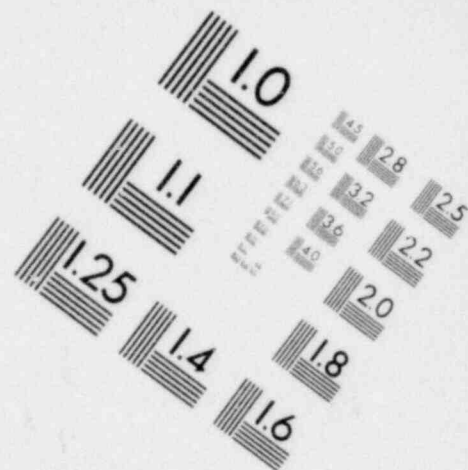
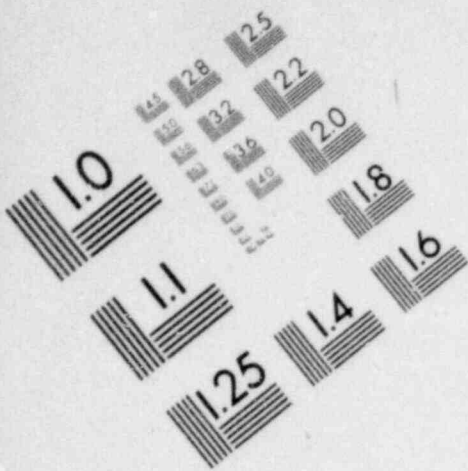
A Because the temperatures were fluctuating between the A code and the B code. One would read higher than the other one day, and then the next day, the other one. It may trend high for a period of a couple of days, and it was only a few degrees high, and then it would slip over to the other one.

The electromatic, itself, never indicated a high temperature prior to March 28th.

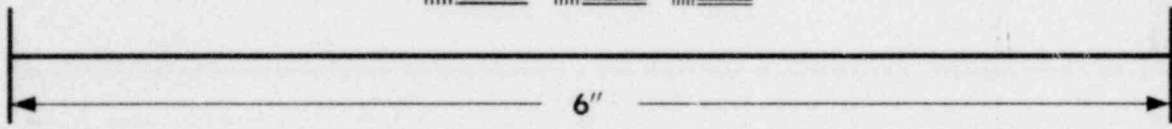
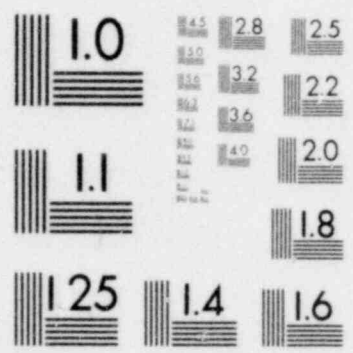
Q So it had been concluded that the PORV was not leaking, but it was probably one of the two code safeties?

A Right.

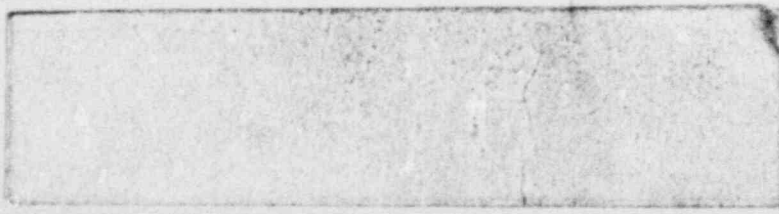
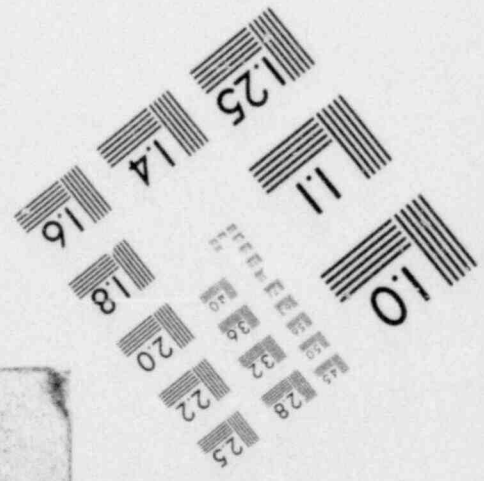
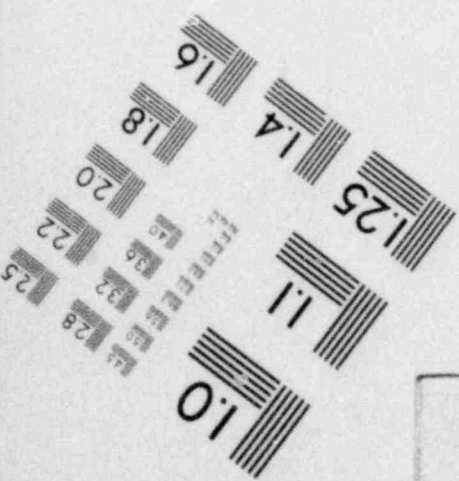
Q How would you correct that leak from one of the code safeties?



**IMAGE EVALUATION
TEST TARGET (MT-3)**



MICROCOPY RESOLUTION TEST CHART



2 A The only way it could have been corrected was
3 to completely shut down, depressurize, and remove the
4 code.

5 Q Was there a concern because of this leak
6 from the code safeties?

7 A There was a concern. We were trying to determine
8 which one was leaking so we knew which one to fix
9 when we did shut down the next time.

10 Q Was there concern that you would shut
11 down to fix that code safety?

12 A There was no immediate concern that we were going
13 to shut down to fix the code safety. The next shutdown,
14 we were going to fix it.

15 Q So you would wait until the plant shut down?

16 A Unless conditions got to the point where we would
17 not operate -- in other words, it exceeded our leakage
18 rate.

19 Q Would that be measured --

20 A During primary system inventory.

21 Q And that leakage rate is set out in the
22 tech specs?

23 A Yes.

24 Q On March 28th, at 4:00 a.m., were you on-site?

25 A No.

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Mehler

152

2 Q Could you tell me what time you arrived
3 on-site?

4 A Approximately 10 of 6:00.

5 Q And were you called at home to come on-site?

6 A Yes.

7 Q By whom?

8 A I don't -- it was an engineer. I don't know if
9 it was George Kunder or not. Some engineer called me
10 and got me out of bed and said, "The turbine tripped,
11 the reactor tripped. Come out to work." I said, "I
12 will be there."

13 Q You didn't ask who it was?

14 A No. He did identify himself, but, you know --

15 Q You don't remember his name?

16 A No.

17 Q What happened when you got there?

18 A Like I said, I got there about 10 of 6:00.
19 When I got there in the control room at that particular
20 time, Mr. Zewe, Mr. Fox, Frederick, Scheimann, Ross
21 and Ken Bryan.

22 Q And did anybody give you instructions at
23 that point?

24 A When I walked in, I asked Bryan, which would
25 have been his Unit 1 supervisor of Ops, and he was

2 also filling in for Jim while Jim was in Lynchburg.
3 I asked him what unit he wanted me to -- because Ken
4 Bryan should have been in Unit 1 at that particular
5 time, and he indicated to me to go to Unit 1 and assist.
6 Ken was already there. He said he would go, so I stayed
7 at Unit 2.

8 Q So Ken Bryan was on duty, on shift in Unit 1
9 that morning, and he had come over to Unit 2, and when
10 you arrived, he went back and assumed his responsibility
11 in Unit 1, and you stayed in Unit 2?

12 A That is correct.

13 Q Is there a requirement that there be a
14 shift supervisor in each unit at all times?

15 A No.

16 Q Just one?

17 A Requirement of shift supervisor is on-site.
18 The reason we had two at that particular time in Unit 1
19 is they were in a refueling outage.

20 Q And were you given specific responsibilities
21 in Unit 2 at that point?

22 A No, I was not given specific responsibilities
23 at that point. What I did do is I went up to the panel
24 to see what was going on, and I talked to Bill, and
25 they told me they just secured, isolated B generator,

2 and he said they have a tube rupture in it, and they
3 informed me that the emergency feed valves, the 12's,
4 were closed, and at that point I looked over Scheimann's
5 shoulder -- he was watching pressurizer level, tempera-
6 ture, and pressure, and I noticed that the pressure
7 was low and that the pressurizer was solid, and that
8 all temperature -- also at that time, the reactor
9 coolant pumps were off, and they were trying to main-
10 tain natural circulation, and I noticed that our
11 temperatures were pegged high and low.

12 Our immediate concern, you know, when I looked
13 at it, what I saw was the pressurizer being solid and
14 no pressure in the system, pressure going down. It
15 would indicate to me at that particular time that either
16 the heaters weren't functioning or that we had a leak.

17 And I asked him if they checked if the heaters
18 were on, and they sent down an AO, and I turned around
19 and I seen Carl Guthrie coming on shift, the shift
20 foreman, and I asked him to go down and confirm that
21 the heaters were, in fact, energized and functioning.

22 Then I pushed out the temperature for the elec-
23 tromatic and codes, and from that point, I assumed
24 that the electromatic was partially opened because of
25 the temperature, and I had Scheimann close the block

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valve.

Q So that you were not given any specific responsibility or directed to do any one thing, but you were assessing the situation?

A Yes.

Q You indicated that Mr. Scheimann was reading the pressurizer level and the temperature and pressure?

A He was right in the area, standing right over, and there is the pressurizer level, there is the temperature (Indicating), you know, he was right in front of it.

Q And you were receiving conflicting readings because the RC pressure was low and the pressurizer level was high?

A That is correct. At that point, with the pressurizer level being high and pressure low, from what I could see, what I could ascertain is that we had the steam bubbles in the hot lines.

Q Did you discuss that, what you were seeing from the pressurizer level and the pressure readings, with Mr. Scheimann?

A No, I didn't.

Q Did he indicate any concern to you about those readings?

2 A All he indicated was that the pressure kept
3 going down.

4 Q So pressure was continuing to decrease?

5 A It was on a slow decrease when I got there,
6 and I didn't physically look up and pick off the
7 pressure right at that time. I just looked at the
8 increments on the chart. I assume we were in the
9 neighborhood of 900 pounds.

10 Q And because of this conflicting reading
11 that you were receiving from the pressurizer level
12 being high and the RC pressure low and slowly declining,
13 you concluded that one of two things, that either the
14 heaters were not functioning, or that there was a leak?

15 A Yes.

16 Q Is that correct?

17 A That is correct.

18 Q And you sent a shift foreman down to check
19 the heaters?

20 A Carl Guthrie.

21 Q And what information did he come back with?

22 A He got back after I confirmed that the electro-
23 matic was, in fact, partially open. I already had
24 pressure recovering before he reported back.

25 Q So you did not wait for him to get back

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to you?

A No.

Q You at that time pulled information from the computer?

A Yes.

Q As to the temperature readings for the electromatic and the code safeties?

A Yes.

Q How quickly did you get that information from the computer?

A I got there, I would assume, around 10 of 6:00, and, you know, I still say it was 10 after 6:00 when I told him to close the electromatic block valve. I wasn't watching the clock.

Q I understand, but you retrieved that information quickly from the computer?

A Well, if 20 minutes is quickly --

Q You think it took approximately 20 minutes to get that information from the computer?

A The computer spit out the temperatures as soon as I asked for them. The time element involved when I got there until I asked for the information is to find out what was going on.

Q But once you requested the information

2 from the computer --

3 A It came out right away.

4 Q It came out right away?

5 A Definitely.

6 Q And the temperatures that you retrieved
7 from the computer indicated to you that the PORV was
8 open?

9 A That is correct. Not -- partially opened.

10 Q Partially opened?

11 A Yes.

12 Q How can you tell that it was partially
13 opened as opposed to fully opened?

14 A The temperature wasn't that great. It was just,
15 I would say, in the neighborhood of 16 to 20 degrees
16 higher than the codes, and if it was fully opened,
17 pressure would have been diving at a real steep rate,
18 not the way it was, and I made the assumption that,
19 yes, it could be partially stuck open because pressure
20 was decaying and there was no harm in closing the block
21 valve.

22 Q And you say it was 16 or 20 degrees higher
23 than the code safeties -- that is, in comparison to
24 the higher temperature readings that you have been
25 getting from the code safeties due to this leak?

2 A I don't remember the actual temperature readings
3 that I read that morning. I just compared them against
4 the other ones because each line comes off and then
5 joins a common line, and if one leaks, you will get
6 some feedback to the others, so the one with the higher
7 temperature would indicate that is the one that is
8 leaking.

9 Q But you were receiving higher temperatures
10 from the code safeties due to this leak prior to
11 March 28?

12 A Right. Well, somewhere in the neighborhood prior
13 to this, I would say 195 to 203.

14 Q And you indicated once you received that
15 information from the computer, you directed Mr. Scheimann
16 to close the block valve?

17 A Yes.

18 Q Did you consult with anyone as to that
19 decision?

20 A No. I just told him to close it. Then I told
21 Mike what I saw.

22 Q You told Mr. Scheimann to close it, and
23 you indicated to Mike Ross --

24 A Yes.

25 Q You indicated to Mike Ross, prior to

2 directing Mr. Scheimann to close --

3 A No, I told him to close it.

4 Q Did you consult with anybody else concerning
5 closing the isolation valve?

6 A No.

7 Q Did you not have a conversation with
8 Mr. Kunder?

9 A At that particular time, I didn't even know
10 George was there.

11 Q So you did not discuss with Mr. Kunder
12 your decision to close the isolation valve?

13 A No.

14 Q Did anybody, prior to your suggesting
15 that they close the isolation valve, indicate that
16 they thought the PORV was stuck open?

17 A Could you rephrase that?

18 Q Prior to your conclusion that the PORV
19 was failed open and your suggestion to Mr. Scheimann
20 that he close the isolation valve, had anybody sug-
21 gested to you that the isolation valve be closed?

22 A No, no one suggested that, but after I closed
23 it, I did talk to Bill, and Bill indicated that they
24 did punch out the temperatures prior to that, and they
25 could not determine that it was open.

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Mehler

161

2 Q Bill who?

3 A Zewe.

4 Q So he indicated that prior, to your checking
5 out the temperatures, that they had previously checked
6 out those temperatures?

7 A That is correct.

8 Q From the computer?

9 A Yes.

10 Q And that they had not received --

11 A In their judgment, it wasn't open.

12 Q Based on their readings, they determined
13 that they thought it was not open?

14 A That is correct.

15 Q Are you aware of a conversation on the
16 phone with Lee Rogers that was at B&W concerning
17 whether or not the PORV was failed open?

18 A No.

19 Q You did not talk with Lee Rogers concerning
20 the PORV failed open?

21 A No, I didn't.

22 Q You indicated one of the conflicting signals
23 you were receiving that morning was the fact that
24 RC pressure was low and declining, and that the
25 pressurizer level was high.

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A That's correct.

Q Were there any other conflicting or erroneous signals that you were receiving that morning?

A Those were the immediate things I saw. At this particular time, we had no pumps running. We isolated B steam generator prior to my getting there. The only other thing that bothered me is that the temperatures, "T" hot and "T" cold were pegged, one low, one high.

Q And that would be a conflicting signal?

A Definitely.

Q They should not be the same --

A No, they should have been on-scale. I should have known what they were reading.

Q They were off-scale; is that what you are saying?

A Yes, they were reading as high as possible. The meter only goes up to 620 - 520.

Q And they were both --

A One was at 520 and one was at 620.

Q And that concerned you?

A Yes. At that particular time, my main concern, though, was to re-establish pressure.

Q You indicated that you noticed that the 12 valves were closed?

2 A No, I did not notice that.

3 Q When you came into the control room, they--

4 A I was informed that the 12 valves were closed.

5 Q Do you know who realized that the 12 valves
6 were closed?

7 A No, I don't.

8 Q Who informed you that they were closed?

9 A Bill Zewe.

10 Q Did he indicate that he had instructed
11 somebody to open them?

12 A Well, they were open when I got there.

13 Q He just was indicating to you that they had
14 been closed?

15 A He indicated to me that they were closed, and
16 that is the reason why they lost feedwater. The emergency
17 pumps did function the way they were supposed to, and
18 everything, but because the 12 valves being closed,
19 which are an upstream block valve, they had no flow,
20 which I don't know how long it took them to find that.
21 I could tell you now because I read the report, but
22 at that particular moment, I did not know, and all he
23 did indicate to me was that the 12's were closed.

24 Q So when he indicated this to you, he was
25 just informing you as to the status of the plant?

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Mehler

164

2 A He informed me of a few things, that the 12
3 valves were closed, he had just finished isolating
4 the B steam generator because of a suspected tube
5 leak; also that the reactor coolant pumps were off,
6 and he was trying to go into natural circulation.

7 Q So when you came into the control room,
8 he was giving you a status report?

9 A Basically, that is what he was trying to inform
10 me of.

11 Q Who was in the control room from the time
12 that you arrived at about 5:50 that morning. Was there
13 one individual that was giving instructions?

14 A From 5:50 on, or prior to 5:50?

15 Q From 5:50 on, from the time that you
16 arrived there?

17 A Up until the time, I would say, that Gary Miller
18 and those people arrived on-site, it was more or less
19 being discussed between Bill, Mike Ross and myself, of
20 what evolutions we would do.

21 Q So the three of you discussed various
22 decisions that were made?

23 A Yes.

24 Q And were functioning jointly?

25 A More or less, yes. That only lasted for a few

2 minutes, for about 40 minutes.

3 Q And after the 40 minutes, Gary Miller came?

4 A No, that is when all the radiation alarms went
5 out.

6 Q When a site emergency was declared?

7 A That is correct.

8 Q At that point, who took charge?

9 A At that point, as far as the operating, you
10 know, up at the panel, I more or less got removed
11 from it; I couldn't answer that.

12 Q And when a site emergency was declared,
13 what responsibilities were you given?

14 A I immediately started to set up the communications
15 to isoplasts, etc., and tried to establish communica-
16 tions with people, making sure the emergency control
17 station was manned. And then Mr. Seelinger was there,
18 came in also, and he took over, and then he asked me
19 to go through the procedures and make sure we were
20 complying with all of them, and from then on -- then
21 I moved out of that range into the range of trying to
22 get the interlocks defeated on the reactor coolant pumps
23 so we could start them. I was also moving into the
24 range of trying to re-establish vacuum in the condenser
25 so we could get steam back into the A steam generator

2 rather than through the atmospherics.

3 Q At what point were you relieved of your
4 responsibilities that day?

5 A To go home?

6 Q Yes.

7 A Ten o'clock that night.

8 Q And you indicated that once a site emer-
9 gency was declared, that you were involved with
10 communicating with people. Which people?

11 A You have to establish communication with the
12 emergency control station, which would be down in the
13 Unit 1 HP area control tower, you know, the headphones.
14 Also, you have to have communications up to the control
15 room. I had put an AO on the telephone to take
16 messages, and by that time, Howard Crawford showed up.
17 I was on the isoplast, and Mr. Seelinger was there,
18 and then he took control of that station. I was only
19 involved in that maybe the first 15 minutes of trying
20 to get it set up, trying to establish communication.

21 In the meantime that was being done, we had
22 engineers in the office, making the off-site
23 notification.

24 Q You had engineers contacting off-site
25 personnel?

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Mehler

167

2 A Yes, off-site personnel, and Margaret Reilly --
3 I forget her outfit.

4 Q The state agencies?

5 A State agencies, Civil Defense -- in fact, the two
6 engineers, I believe, who did it were Dick Bensel and
7 Ron Warren. That is the first thing they were doing
8 while he was setting up outside.

9 Q So that your responsibility was ensuring
10 that the people were notified and ensuring that these
11 two engineers were making the appropriate contacts?

12 A They were doing it. It was almost automatic.
13 As soon as we declared it, they moved right into it.

14 Q Who assigned that task to these two
15 engineers?

16 A I don't know.

17 Q It was not you?

18 A It was not me.

19 Q You indicated earlier that you were ensuring
20 that emergency procedures were being complied with.
21 Did you mean emergency --

22 A Radiation emergency procedures.

23 Q Did you pull those emergency procedures?

24 A They were all back there on the desk, the whole
25 bunch.

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Mehler

168

2 Q And was there a checklist that you were
3 going through?

4 A Basically we went through them to ensure that
5 they were doing them. Some of them did not pertain
6 at that particular moment and couldn't be done at
7 that time because we didn't have the off-site crews on.

8 Q Were there people later that day from
9 the NRC in the control room?

10 A Yes.

11 Q Were you reporting to them?

12 A I had no specific instructions to report to them.
13 If they asked me information, I gave it to them, and
14 they asked us a lot. They were a pain in the butt.

15 Q They would come up to you and ask you
16 questions?

17 A Yes.

18 Q Do you remember their names?

19 A No, I don't.

20 Q Do you know how many were there?

21 A I can only guess, and I would say in the
22 neighborhood of three to four.

23 Q When the NRC people were there, was there
24 any conflict in who was in control?

25 A They had nothing to do with anything.

2 Q They would just ask you questions?

3 A Yes. They did not know what was going on.

4 Q Do you remember anything of the questions
5 that they asked you?

6 A Yes. Most of the time, it was why are we doing
7 this, why are we doing that. I know of a specific
8 question is when the building spray pumps were on,
9 why did they come on. I had to spend my time explaining
10 to them why they came on, and they were always asking
11 us what is the temperature, what is "T" hot, what
12 is "T" cold, what is the pressure, and then they would
13 report back to their own on the telephone.

14 MR. YUSPEH: To the best of your knowledge,
15 were any of the NRC people in the control room
16 at that time licensed reactor operators?

17 THE WITNESS: To my knowledge, none of
18 them were.

19 Q Had you ever met with any of the NRC
20 people that were in the control room at that time
21 prior to March 28?

22 A The only one that I knew was Don Habercamp, and
23 I don't know what time he showed up. I think he showed
24 up somewhere in the neighborhood of ten o'clock that
25 morning.

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Mehler

170

2 Q He was in the control room from ten o'clock
3 on?

4 A Yes, I did see him.

5 Q Was he one of the people that were asking
6 you questions?

7 A He was one of the better ones.

8 Q Does that mean he asked fewer questions?

9 A He knew where to find some of the information.
10 He didn't bother you as much. They weren't the only
11 problem. We had a lot of off-site calls.

12 Q From state agencies?

13 A No, from people.

14 Q From members of the public?

15 A Yes.

16 Q Calling the control room?

17 A I don't know how they got the phone number.
18 Someone called from Chicago, Illinois. Also, the
19 insurance carriers were calling.

20 Q The Metropolitan Edison insurance carriers?

21 A Yes.

22 Q And you took some of these calls?

23 A Well, the control room operators really took
24 the calls, and they, in turn, didn't know what to do,
25 and so they passed them on to me and I passed them on

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Mehler

171

2 George, trying to find out what they wanted to do with
3 these people.

4 Q And is the phone that was in the control
5 room that morning a direct line into the control room?
6 Did calls into the control room have to go through
7 a switchboard?

8 A If the switchboard is manned.

9 Q It was not manned that morning?

10 A I couldn't tell you. I really don't know. I
11 don't believe it was because, you know, we were getting
12 outside phone calls. We do have a night bell, which,
13 in turn, when the girl leaves the switchboard, she
14 turns it ^{off} off, and then the phones do ring in the
15 control room.

16 Q How many phones were there?

17 A Prior to the accident, I think in the control
18 room we had three outside lines.

19 Q Do you know if that number that was into
20 the control room was a listed number?

21 A I believe it is listed. The only unlisted I
22 know is in Unit 1's shift supervisor's office.

23 MR. YUSPEH: Could we go off the record
24 for a second.

25 (Discussion held off the record.)

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Mehler

172

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Q You indicated that you were sure that

3

at 10 after 6:00, you asked Mr. Scheimann to close

4

the isolation valves, correct?

5

A Yes.

6

Q Did you look at a clock at that point?

7

A I don't recall if I looked up at the clock or

8

not.

9

Q But for some reason that time --

10

A Ten after 6:00 is fixed in my mind.

11

Q Can you explain what your perception of time

12

was for the period from about 10 of 6:00 to ten o'clock

13

at night that you were in the control room?

14

A Time went by real fast. There is only certain

15

instances that stick in my mind, you know, of time

16

elements. Really there is only one, and that is when

17

the building spray pumps came on, and that was 1:15.

18

Q And other than that, you really have no

19

idea?

20

A Perception of time, you know, incidents, you

21

know, one incident happening before or after another, no.

22

Q Things were moving very quickly?

23

A Well, I do know when we declared site emergency.

24

That was roughly a quarter of, ten of 7:00. I do know

25

that we re-established vacuum on the condenser somewhere

1
2 around noontime, I would say anywhere from 12 o'clock
3 to 2 o'clock.

4 When we ran the first reactor coolant pump, that
5 was late afternoon, you know, and I would have to guess
6 in a period of four hours, somewhere from 4 o'clock to
7 8 o'clock.

8 Once the reactor coolant pump was running, then
9 we started to get our temperatures, and we could really
10 see what was going on.

11 Q So that morning on the 28th, did you pull
12 any specific emergency procedures?

13 A No, I didn't.

14 Q Do you know if anyone pulled --

15 A No, I don't.

16 Q You never referred to any written emergency
17 procedure?

18 A No, I didn't.

19 Q Do you know if anybody else referred to
20 any specific emergency procedure?

21 A No, I don't.

22 Q Surveillance procedures for TMI 2 are
23 required in some instances daily, some weekly,
24 quarterly, monthly, depending upon the system that is
25 being surveilled, pursuant to tech specs, correct?

1
2 A Yes.

3 Q As I understand it, the shift foreman re-
4 ceives a computer printout as to what specific sur-
5 veillance tests should be performed.

6 A Yes, and the due date. That comes out weekly.

7 Q Do you review --

8 A Yes, we review that in the POD meetings.

9 Q Each day?

10 A Yes, you have the POD meeting.

11 Q That surveillance test is reviewed?

12 A I do not review the surveillance test itself.
13 I review that the computer printout -- that it is
14 due that day.

15 Q Do you ever see the completed test that
16 has been performed?

17 A Sometimes.

18 Q Under what circumstances would you see that?

19 A Usually I will see them when there is an exception
20 or a deficiency on the surveillance.

21 Q If there is --

22 A I will see it if there is an exception or
23 deficiency because I have to sign them off.

24 Q If there is an exception or deficiency,
25 you have to sign off on that form?

A Yes.

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Mehler

175

2 Q Do you review with the shift foreman what
3 test has been performed if it has been ascertained
4 that there is a deficiency?

5 A Normally, no, I do not go through the surveil-
6 lance itself. They do the surveillance. When it is
7 done, if some of the criteria in the surveillance is
8 not met, if there is an E or a D, then it will be
9 brought to me, and then I will review the E or the D
10 to determine whether it is reportable or there is a
11 time limit involved until we can get the system back
12 in service and how fast we have to move on it.

13 An exception is not as critical as a deficiency.
14 Deficiency says that the surveillance procedure did
15 not meet its acceptance criteria.

16 Q So you review it to determine what the
17 results were of those tests?

18 A Only if it has an exception or a deficiency.

19 Q And only if it has an E or a D do you
20 review it, and you look to see what the results were?

21 A Yes.

22 Q And then what do you do with that
23 information?

24 A That information?

25 Q Yes.

2 A Depending on the magnitude. If it is an excep-
3 tion, really it is just turned in to the surveillance
4 coordinator, and a work request would be submitted to
5 take care of the exception. It could be, like, just
6 a broken indication, you know, which really has no
7 bearing on meeting acceptance criteria to the surveillance.

8 Now, if it fails the acceptance criteria for
9 the surveillance, it would be a discrepancy, depending
10 on whether we had a backup system to that, which would
11 give us anywhere from 48 to 72 hours to get that one
12 fixed to meet acceptance criteria. Then I have to get
13 the chain in motion to get the people to fix it. Also,
14 I would call George at that time or Floyd.

15 Q What is the difference between an excep-
16 tion and a deficiency?

17 A A deficiency is when you do the surveillance and
18 it does not meet its acceptance criteria. An excep-
19 tion could be that it tells you to use a zero to 100
20 pound pressure gauge, and you have a zero to 200 pound
21 pressure gauge. That would be an exception. We use a
22 zero to 200 versus the procedure, saying zero to 100,
23 which has no bearing on meeting the acceptance criteria.

24 Q So for an exception, you have used, in the
25 test surveillance, different instruments for measuring

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Mehler

177

2 than would be specified in the tech specs?

3 A No, in the surveillance procedure.

4 Q In the surveillance procedure?

5 A Yes.

6 Q The surveillance procedures are written
7 pursuant to tech specs, right?

8 A Yes, but the tech specs don't specifically tell
9 you what instruments to use; they just say a pump
10 meets a certain pressure, a certain flow. How you
11 determine that pressure, that flow, is with your
12 instrumentation.

13 Q You, as we discussed yesterday, were
14 maybe one of the founding fathers of TMI. You were
15 here from the construction and startup of Unit 1 and
16 involved also with Unit 2.

17 A Yes.

18 Q And since you are experienced at TMI,
19 there have been numerous people that have come here
20 with Navy training background, correct?

21 A Yes, that is correct.

22 Q How would you compare your training with
23 their training?

24 A I can't compare my training with their training
25 because I don't know what kind of training they had

2 in the Navy.

3 Q Based on your experience working with them--

4 A We have some exceptional people that came out
5 of the Navy program, just like any industry, and you
6 also have some that aren't so good.

7 Q Do you feel that the training that you
8 received since at Metropolitan Edison has prepared
9 you equally as well as the people that came out of the
10 Navy training that you feel are qualified?

11 A Yes.

12 Q I understand that in the control room there
13 is a Reportable Occurrence Book that maintains LERs
14 from TMI 2.

15 A Yes.

16 Q In the Unit 2 control room?

17 A Yes.

18 Q And there is something called a Control
19 Room Operations Memo Book?

20 A There is an Operating Memo Book up there, and
21 I think there is also a Superintendent's Memo Book.

22 Q What does a Superintendent's Memo Book
23 contain?

24 A Basically it is a memo that he wants to get out
25 to the operators, and it will be put in a book for

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their reading.

Q What kind of information would that contain?

Do you remember a specific one?

A No, I can't think of any specific ones off the top of my head.

Q Do you know generally the kind of information?

A It would have something to do with the normal conduct, "You can't use the south gate because of something."

Q Administrative kind of things?

A Right, more administrative than technical.

Q And what kind of things are contained in the Operations Memo Book?

A That would be a memo coming from Floyd which would be basically something that deals with a system like -- I am trying to figure out one. This would be more or less giving instructions to get something done, you know, like -- I am trying to think of a specific memo that he would want to put out that would help us. Relative to that, the secondary man will take the cooling tower temperatures twice a shift, something like that.

Now, he doesn't have a memo like that, but

1
2 basically along those lines. It would not -- basically
3 technical or pertaining to the tech specs, he would
4 not bring out anything in a memo like that.

5 Q How are procedure changes conveyed to the--

6 A In the Revision Review Book.

7 Q And that is another memo book that is kept
8 in the control room?

9 A That is another book that is kept in the control
10 room which is required reading, with a sign-off sheet
11 on that.

12 Q Are you required to read the Superintendent's
13 Memo Book?

14 A There is no sign-off sheet.

15 Q Are you required to read the Control Room
16 Operations Memo Book?

17 A There is still no sign-off sheet.

18 Q Is there a sign-off sheet on Reportable
19 Occurrences?

20 A Yes.

21 Q So the only two books you are required
22 to read are the Reportable Occurrences Book and the
23 Revision Review Book?

24 A They have sign-off sheets.

25 Now, the other memo books, you should read, but

2 there would be no way I could determine whether an
3 individual read it or not.

4 Q Is there a sign-off sheet for you to read
5 the Reportable Occurrence and Revision Review Books?

6 A Yes. Every licensed individual is on that
7 sign-off sheet.

8 Q So every individual that holds an NRC
9 license must review the Reportable Occurrence Book
10 and the Revision Review Book?

11 A Yes.

12 Q Are there any other books that you must
13 read?

14 A There is no sign-off sheets that I know of
15 right now.

16 Q Are there any other books, other than the
17 Operations Memo Book and the Superintendent's Memo
18 Book that do not have sign-off sheets, but that con-
19 tain information that you should read?

20 A Well, there is a lot of logbooks up there.
21 You have your Fire System Log, which just is a
22 record of valves that might be tagged out, you know.
23 There is the TCN Book, the SOP book. Let's see what
24 else we have up there. There is also a "Breach of
25 Containment" Book. Most of these books are not

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Mehler

182

2 required reading; it is information-type. It is
3 available so if you want to find something out, it
4 is there.

5 Q The TCN book would contain completed TCNs?

6 A Yes.

7 Q What does it contain?

8 A Active TCNs. In other words, your TCN is a
9 temporary change note. That TCN would go out. All
10 the procedures pertaining to it plus a copy gets sent
11 to the PORC secretary, plus the original goes in that
12 TCN book.

13 Now, when the TCN either becomes obsolete or
14 is cancelled or the 90 days goes by, or it is changed
15 by a PCR, then it is signed off and it is sent to the
16 secretary.

17 Q What is the SOP Book?

18 A Special Operating Procedures.

19 Q And what are those?

20 A That is basically a procedure that is not covered
21 by a normal operating procedure which might be only a
22 one-time evolution.

23 Q Could you give me an example?

24 A An example right now is that we are draining
25 Unit 1's natural draft cooling towers. We do have an

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2 SOP written to do that. The actual draining is also
3 encompassed in the normal OP, but because of the re-
4 strictions put upon us, we had to have an SOP to tell
5 us what the frequency of sampling should be and who to
6 notify, et cetera.

7 Q Who would draft that Special Operating
8 Procedure?

9 A Anybody could.

10 Q Would it go up through the channels to be
11 reviewed by PORC?

12 A On SOP, you have three blocks there, and if the
13 blocks are "Yes," it will have to get PORC review.
14 If, I think, just Block C is a "No," it can be reviewed
15 and approved by one plant management personnel and a
16 senior operator's license, which in turn, that will
17 be reviewed within, I think, five working days by the
18 superintendent.

19 Q What is the distinction made as to the
20 kind of procedure that has to be reviewed by certain
21 people as opposed to others?

22 A I forget what that block -- I think it has some-
23 thing to do with the effect to personnel radiation
24 exposure.

25 Q Do you know who makes that decision?

2 A The person writing the SOP.

3 Q He makes that decision?

4 A Yes.

5 Q Is there any review of that decision?

6 A Later, by the superintendent.

7 Q What is the "Breach of Containment" Book?

8 A It wasn't "Breach of Containment"; it was "Breach
9 of Fire Walls." I think that is the nomenclature.
10 Basically, if you will notice through the plant, you
11 had any type of hole through a fire barrier, let's
12 say a pipe went through, you have to have it insulated
13 in a certain way. Someone put that stuff on, and then
14 you have a flow put for a fire spray that would be
15 periodically -- it would have -- we would have to do
16 maintenance, and that would require it to be removed,
17 and we have to keep a record of it that we have a fire
18 watch necessary or that it gets re-insulated after the
19 job is done.

20 Q And this book would contain a record of
21 those breaches?

22 A It contains a record of all those that are active.
23 Once it is closed out, that gets sent to the, right
24 now it is Tom O'Connor's.

25 Q You indicated that the other book was a

2 valve book, right?

3 A No, I didn't.

4 Q I believe you said a log that kept track
5 of valves that were tagged out?

6 A That would be the Fire System, notification to
7 insurance company for our fire system on the Island.
8 In other words, they even have their own tags. We
9 fill out the tags and send them a copy, and another
10 tag goes on the valve. We have to call our insurance
11 carrier and inform him what hydrants are tagged out
12 and out of service.

13 Q In an emergency, what is the division
14 of responsibility between the control room operators
15 and the shift supervisors?

16 A What type of emergency are you referring to,
17 radiation emergency or a regular emergency procedure?

18 Q When an emergency procedure is instituted.

19 A Basically, the way it functions is that when
20 you have the emergency, your control room operators
21 respond to the manual actions pertaining to the emer-
22 gency for the reason that the shift supervisor could
23 be in another plant. The shift foreman, in turn, will
24 come up and get the procedure and verify that all the
25 steps were carried out in that emergency procedure,

2 and also the follow-up actions, if necessary.

3 If the supervisor is there, he will back up a
4 shift foreman, basically take an overview of the whole
5 situation and determine everything is being done.

6 Q Would a shift supervisor give his instruc-
7 tions in that situation to --

8 A He should direct it to the shift foreman. Not
9 necessarily would he do it all the time, depending
10 on the type of emergency and the need to perform the
11 operations immediately. He may tell the CRO to do it
12 right now, and that is it.

13 Q As I understand it, on March 28th, some-
14 thing like 200 alarms went off?

15 A I couldn't tell you that.

16 Q Would it be accurate to say that about 200
17 alarms went off?

18 A I could believe that very easily, yes.

19 Q How would you prioritize which alarms to
20 respond to?

21 A If I had 200 alarms lit up, I couldn't priori-
22 tize them because only two alarms up there would really
23 tell me anything, and that would be reactor trip, tur-
24 bine trip. They would be my major two. Other than
25 that, prioritizing alarms would require me to read

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Mehler

187

2 all the 200 to tell which ones should be first.

3 Q Is it fair to say that those alarms were
4 then ignored on March 28th?

5 A I couldn't tell you.

6 Q You were not reading them?

7 A I was not reading them. There weren't that
8 many alarms coming in when I got there. They were
9 already there.

10 Q Since March 28th, you have made certain
11 statements concerning the accident, correct?

12 A I guess, yes. I have talked to other committees.

13 Q I understand you had an interview with
14 the TMI staff on April 25, 1979?

15 A I did. I don't know if it was TMI staff. I had
16 an interview. I don't remember the gentleman's name.

17 Q With a Mr. O'Connor?

18 A Yes.

19 Q Do you know if that is the only time you
20 were interviewed?

21 A I was interviewed by the President's Committee.

22 Q By the TMI staff.

23 A That was the only time, yes.

24 Q You were interviewed by the President's
25 Commission on May 10, 1979?

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Mehler

188

2 A That is correct.

3 Q Were you interviewed by the NRC?

4 A Yes.

5 Q Do you know by whom?

6 A I just remember one individual. I think it
7 was Darryl Hunter.

8 Q Were you interviewed just once by the NRC?

9 A Just once.

10 Q Do you know the date?

11 A No, I don't. Would you like the tape?

12 Q Was that transcribed?

13 A It is on tape.

14 Q It is on tape?

15 A Yes.

16 Q You can just get us the date.

17 A I don't know what the date was. They caught
18 me leaving work.

19 MS. GOLDFRANK: Would you have a record
20 of the date?

21 MR. YUSPEH: I think so.

22 MS. GOLDFRANK: If you could get us the
23 date of that, since it has not been transcribed.

24 MR. YUSPEH: Off the record.

25 (Discussion held off the record.)

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Q Other than your statement with the NRC and your interview with the President's Commission and with the TMI staff, did you make any other statements?

A I made phone calls in the presence of Ernie Blake to Mr. Meyers in Washington. I believe he is a representative of the Udall Committee. I am not sure about that.

Q Did you testify before the Udall Committee?

A No, I didn't. I have talked to Mr. Meyers twice, once in the presence of the attorney, Ernie Blake, and once from my home.

Q And there was no recording made of those phone conversations?

A Not to my knowledge, there wasn't.

Q They didn't tell you that they were recording the conversations?

A They didn't tell me if they were or if they weren't.

MS. GOLDFRANK: Do you have any questions?

MR. YUSPEH: I have none.

MS. GOLDFRANK: At this time, I would like to recess this deposition. I don't anticipate that we would call you back for further questioning, but it is possible that questions would

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come up that we would want to ask you, and at
that time, we would arrange for you to come back.

(Whereupon, at 10:55 a.m., the deposition
was recessed, as above noted.)

Brian A. Mehler

Subscribed and sworn to
before me this __ day
of ----- 1979

Notary Public

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I N D E XWITNESSDIRECT

Brian A. Mehler

119

E X H I B I T SMEHLER DEPOSITION
FOR IDENTIFICATIONPAGE

			<u>PAGE</u>
10	30	Blank form entitled "Three Mile Island Unit 2, Recovery, Burns & Roe Field Questionnaire," revised since March 28, 1979 to include the word "Recovery"	119
13	31	Blank form entitled "Three Mile Island Nuclear Station GPU Startup Problem Report"	119
15	32	Blank form entitled "Three Mile Island Nuclear Station Problem Report"	119
17	33	"Generation Corrective Maintenance System, Job Ticket Form, Work Request, Three Mile Island" indicating "Unit 1"	119
19	34	Copy of Page 5 of Operating Procedure 2103-1.3; Section 2.1.8 is specifically marked with a circle	119
21	35	Operating Procedure 1103-5, Revision 11, dated 6/28/79; Section 8 circled.	119

PRESIDENT'S COMMISSION ON THE
ACCIDENT AT THREE MILE ISLAND

Corrections to July 26, 1979, Deposition of Brian Mehler

<u>Page</u>	<u>Line</u>	<u>Change</u>	<u>To Read</u>
9	18	oil	old.
16	17	Before	for
21	2.	Surveillance	Emergency.
32	21	14	8
45	20	four	Two.
51	12	Controls	Control Room
58	3.	Bleed	Leak
58	5	Bleed	Leak.
66	22	Yes	No.
70	7	Det2. 100	Mod Comp.
71	25	Det2. 100	Mod Comp.
77	21	CRO	SRO.
77	22	2	I
80	13	1	2.
101	21	wrong.	(Delete word)
106	18	—	add NOT after would.
113	16	CONTAMINATION	CONTAINMENT.

Brian A. Mehler
Brian A. Mehler

Subscribed and sworn to
before me this 9th day
of August, 1979

Loretta M. Baum
Notary Public

Notary Public
Palmyra, Delaware
My Commission Expires 12/31/1980

PRESIDENT'S COMMISSION ON THE
ACCIDENT AT THREE MILE ISLAND

Corrections to July 26, 1979, Deposition of Brian Mehler

<u>Page</u>	<u>Line</u>	<u>Change</u>	<u>To Read</u>
124	5	This	There
127	20	up	out
127	24	up	out
152	20	Fox	Faust
152	24	Bryau	Ross
172	17	1:15	1:50

Brian A. Mehler
Brian A. Mehler

Subscribed and sworn to
before me this 9th day
of August, 1979

Lucille M. Baum
Notary Public

Lucille M. Baum
Palm Beach County, Pa.
My Commission Expires Feb. 23, 1980