



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

February 19, 1980

Alan S. Rosenthal, Esq., Chairman
Atomic Safety and Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. John H. Buck, Member
Atomic Safety and Licensing Appeal
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Dr. W. Reed Johnson
Atomic Safety and Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of Metropolitan Edison Company, et al.
(Three Mile Island Nuclear Station, Unit 2)
Docket No. 50-320

Gentlemen:

As promised in my letter of February 4, 1980, enclosed are copies of the completed questionnaires submitted by Edward Beuerlein, a TWA pilot, and David Lithgow, a Transamerica Airlines pilot, who were subpoenaed by the Staff.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence J. Chandler".

Lawrence J. Chandler
Counsel for NRC Staff

Enclosure: As stated

cc w/encl: Service List

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1. Q. What is your name and by whom are you employed?
A. My name is Edward Beuerlein and I am employed by Trans World Airlines.
2. Q. In what capacity are you currently employed and how long have you been in that position?
A. I am currently a Captain and I have been so employed since August 1968.
3. Q. Briefly describe your prior professional (including military) experience and training.
A. I entered the USAF in June 1951 and served as a pilot in the USAF until October 1955. Upon release from the USAF, I was employed by TWA in December 1955.
4. Q. On what aircraft are you now and were you, in the past, rated?
A. Presently flying B-707 and previously flew Constellation Aircraft as Captain.
5. Q. Regarding your present position, could you please describe your duties.
A. Captain on B-707 flying scheduled flights within USA during winter months and international flights on B-707 during summer months.
6. Q. Have you ever piloted an aircraft into and out of Harrisburg International Airport (HIA)?
A. Yes.
7. Q. Have you done so since construction of the Three Mile Island Nuclear Station has been completed?
A. Yes.

For the following questions, please assume you are piloting an aircraft of 200,000 or greater, which, for purposes of this proceeding, include all models of the Boeing 707, 747, McDonnell Douglas DC-8, DC-10 and Lockheed L-1011.

8. Q. Please describe what you would consider to be an appropriate approach to Harrisburg International Airport?
 - A. Under instrument conditions either a radar vectored approach to RW 13 or RW 31. Under visual conditions; a radar vector to a visual approach to either runway.
9. Q. Are there any airport, company, or FAA regulations, rules, instructions, guidance, directives, or procedures that influence your prior answer?
 - A. Only weather conditions dictate type of approach.
10. Q. Do you know whether MDT has an ILS? (Harrisburg International-Olmsted Airline designator is MDT.)
 - A. Yes, Runway 13 and Runway 31.
11. Q. Would that influence your prior answer?
 - A. Yes, weather conditions at time of arrival determine minimum altitude for decent to landing using ILS.
12. Q. Assuming you were given VFR clearance, would that affect your prior answer?
 - A. Yes, weather conditions when good do not require ILS but use ILS for reference at all airports.
13. Q. Would you, and under what circumstances, make an approach to the airport, flying over the TMI nuclear plant?
 - A. Not directly over but around the west, south, and east of the plant when making a visual approach to RW 31 from the west. The plant at night is a good reference point for RW 31.
14. Q. On those occasions when you have flown into HIA indicated in answer to question 7, have you flown over the TMI nuclear plant?
 - A. Not directly over the plant.

15. Q. When taking off from MDT, are there any airport, company, or FAA regulations, rules, instructions, guidance, directives, or procedures, that prescribe your flight path?
- A. Yes, departing RW 31 climb RW heading to 1500' before turning on course, and RW 13 climb RW heading to 1000' before turning on course.
16. Q. Taking your answer to Question 15 into consideration, are there circumstances under which you would overfly the TMI nuclear plant during a takeoff?
- A. No.
17. Q. On those occasions when you have flown from HIA indicated in your answer to Question 7, have you flown over the TMI nuclear plant?
- A. No.
18. Q. On takeoff and landing at HIA, please estimate how close you pass the TMI nuclear plant.
- A. On takeoff, about 1-1/2 miles using RW 13; on landing, about 1-1/2 miles using RW 31.

1. Q. What is your name and by whom are you employed?
A. My name is David Lithgow and I am employed by Transamerica Airlines.
2. Q. In what capacity are you currently employed and how long have you been in that position?
A. I am currently a DC-8 Captain and I have been so employed since June 1978.
3. Q. Briefly describe your prior professional (including military) experience and training.
A. USAF 1964-1970; trained in and flew T-37, T-38, L-382, DH-4, and L-300. Worked as an instructor pilot in L-382 and L-300. Civilian experience: DC-8 F/O and Captain at Transamerica Airlines.
4. Q. On what aircraft are you now and were you, in the past, rated?
A. DC-8, DH-4, L-382, L-300.
5. Q. Regarding your present position, could you please describe your duties.
A. Final command responsibility for DC-8 operation under FAR Part 121 and ICAO regulations.
6. Q. Have you ever piloted an aircraft into and out of Harrisburg International Airport (HIA)?
A. Yes.
7. Q. Have you done so since construction of the Three Mile Island Nuclear Station has been completed?
A. I do not know when it was completed.

For the following questions, please assume you are piloting an aircraft of 200,000 or greater, which, for purposes of this proceeding, include all models of the Boeing 707, 747, McDonnell Douglas DC-8, DC-10 and Lockheed L-1011.

8. Q. Please describe what you would consider to be an appropriate approach to Harrisburg International Airport?
- A. ILS RWY 13, LOC (Back-CRS) or ASR RWY 31.
9. Q. Are there any airport, company, or FAA regulations, rules, instructions, guidance, directives, or procedures that influence your prior answer?
- A. Yes.
10. Q. Do you know whether HIA has an ILS?
- A. Yes.
11. Q. Would that influence your prior answer?
- A. Yes.
12. Q. Assuming you were given VFR clearance, would that affect your prior answer?
- A. No.
13. Q. Would you, and under what circumstances, make an approach to the airport, flying over the TMI nuclear plant?
- A. No.
14. Q. On those occasions when you have flown into HIA indicated in answer to question 7, have you flown over the TMI nuclear plant?
- A. No.

15. Q. When taking off from HIA, are there any airport, company, or FAA regulations, rules, instructions, guidance, directives, or procedures, that prescribe your flight path?
- A. Yes.
16. Q. Taking your answer to Question 15 into consideration, are there circumstances under which you would overfly the TMI nuclear plant during a takeoff?
- A. No.
17. Q. On those occasions when you have flown from HIA indicated in your answer to Question 7, have you flown over the TMI nuclear plant?
- A. No.
18. Q. On takeoff and landing at HIA, please estimate how close you pass the TMI nuclear plant.
- A. On takeoff, about 2 NM; on landing, about 1.5 NM.