

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of  
METROPOLITAN EDISON COMPANY,  
ET AL.  
(Three Mile Island, Unit 1)

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Docket No. 50-289

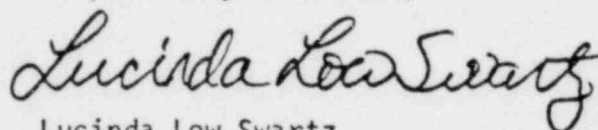
SECOND SET OF NRC STAFF INTERROGATORIES OF  
CHESAPEAKE ENERGY ALLIANCE

Pursuant to 10 C.F.R. § 2.740b, the following interrogatories are directed to Chesapeake Energy Alliance. Each interrogatory is to be answered separately and fully in writing under oath or affirmation by individuals having personal knowledge of the answers. The Licensing Board in this proceeding has directed that all responses to interrogatories must be in the hands of the discovering party 35 days after the issuance of the SER (July 21, 1980). (The Memorandum and Order on Prehearing Conference of May 13, 1980 (May 22, 1980), at 7.)

All parties are reminded that § 2.740(e) of the Commission's regulations requires parties to amend their responses when they are no longer true. Thus, intervenors who were not able to answer the general interrogatories submitted in the "First Set of NRC Staff Interrogatories to Intervenors" dated December 27, 1979 or the interrogatories submitted in this pleading are obligated to respond to the interrogatories upon receipt of the requested information.

All of the specific interrogatories attached refer to information contained in the Staff's "TMI-1 Restart Evaluation of Licensee's Compliance with the Short-and Long-Term Items of Section II of NRC Order dated August 9, 1979" (SER) which was served on all parties to this proceeding on June 16, 1980. Page numbers in the interrogatories refer to the SER. The general interrogatories inquire into how the parties intend to use documents, including the SER, in their presentations of evidence.

Respectfully submitted,



Lucinda Low Swartz  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 1st day of July, 1980.

CEA

GENERAL INTERROGATORIES

1. Identify by author, title, date of publication and publisher, all books, documents, and papers you intend at this time to employ or rely upon in presenting your direct case on:
  - a. Contention 5
  - b. Contention 6
  - c. Contention 7
  - d. Contention 8
  - e. Contention 9
  - f. Contention 13
  
2. Identify by author, title, date of publication, and publisher, all books, documents, or papers that you intend at this time to employ or rely upon in conducting your cross-examination of prospective NRC witnesses testifying in connection with:
  - a. Contention 5
  - b. Contention 6
  - c. Contention 7
  - d. Contention 8
  - e. Contention 9
  - f. Contention 13
  
3. If the representations in:
  - a. Contention 5
  - b. Contention 6
  - c. Contention 7

- d. Contention 8
- e. Contention 9
- f. Contention 13

are based in whole or in part on any documents prepared by the NRC Staff or the licensee which you contend are deficient, specify which documents (and the particular portions) you regard as deficient and explain why they are deficient.

SPECIFIC INTERROGATORIES

The Staff discusses the separation of TMI-1 operations from those at TMI-2 on pages C4-1 through C4-11. After reviewing this evaluation, please answer the following questions:

Contention 5

- 5-1 Do you still believe that the presence of TMI-2 precludes a finding of reasonable assurance that TMI-1 can be operated safely? If so, explain in detail the basis for your belief and identify the documents which support your position.
- 5-2 Do you still believe that further developments at TMI-2 may require the emergency use of TMI-1 such that TMI-1 cannot be operated safely? If so, explain in detail the basis for your belief and identify the documents which support your position.
- 5-3 If the answer to 5-2 is "yes," describe all possible scenarios at TMI-2 which you believe would require the emergency use of TMI-1 facilities.
- 5-4 Do you believe there is adequate storage water capacity at TMI in the event of an accident at TMI-1? If not, explain in detail the basis for your belief and identify the documents which support your position.

- 5-5 If the answer to 5-4 is "no" describe all possible accident scenarios at TMI-1 for which you believe there would be inadequate storage water capacity.
- 5-6 Do you believe that the Staff's evaluation of licensee's compliance with Order Item 4 is inadequate in any way? If so, describe in detail each of those inadequacies and identify the documents which support your position.

Contention 7

- 7-1 Do you still believe that licensee's radiation monitoring provisions are unable to discriminate between effluents of TMI-1 and TMI-2? If so, explain in detail the basis for your belief and identify the documents which support your position. (Refer to page C4-11).

Contention 8

On pages C6-1 through C6-24, the Staff discusses the licensee's compliance with Order Item 6 concerning management capability. After reviewing this evaluation, please answer the following questions:

- 8-1 Do you still believe that licensee lacks the management capability to operate TMI-1 without endangering the health and safety of the public? If so, explain in detail the reasons for your belief and identify the documents which support your position.
- 8-2 If the answer to 8-1 is "no," what specific measure do you believe licensee should take in order to ensure that it is competent to manage TMI-1?
- 8-3 Do you believe that the changes made by the licensee in its management structure, facility procedures, operator training, quality assurance program and health physics program as described in the Restart Report and



evaluated in the SER will improve the licensee's ability to competently manage the operation of TMI-1?

- 8-4 Do you believe that regardless of any measures licensee takes to improve its management competence, licensee will be unable to manage and operate TMI-1 in a competent manner? If so, explain in detail the reasons for your belief and identify the documents which support your position.
- 8-5 Do you still believe that the licensee's ability to decontaminate TMI-2 reflects upon its ability to competently manage and operate TMI-1?
- 8-6 If the answer to 8-5 is "yes," in what specific ways does the licensee's ability to decontaminate TMI-2 reflect upon its ability to competently manage and operate TMI-1? Please identify the documents which support your position.
- 8-7 Do you believe that the Staff's evaluation of licensee's compliance with Order Item 6 is inadequate in any way? If so, describe in detail each of those inadequacies and identify the documents which support your position.

#### Contention 9

On pages C7-1 through C7-19, the Staff discusses the licensee's compliance with Order Item 7 concerning financial qualifications. After reviewing this evaluation, please answer the following questions:

- 9-1 In light of the licensee's response to the Commission's August 9, 1979 Order, your review of the May 23, 1980 PUC Order, and the Staff analysis to date, do you still believe that licensee has inadequate financial resources to operate TMI-1 safely? If so, explain in detail the reasons for your belief and identify the documents which support your position.

- 9-2 What costs do you contend that the licensee will have to cover with regard to the clean-up of TMI-2? Explain in detail the reasons for your cost estimate and identify the documents which support your position.
- 9-3 Do you believe that the Staff's evaluation of licensee's compliance with Order Item 7 is inadequate in any way? If so, describe in detail each of those inadequacies and identify the documents upon which you rely to support your position.
- 9-4 What are the bases for your contention that an accident such as occurred at TMI-2 should reasonably be assumed to occur at TMI-1 in light of the plant, personnel, and procedural changes that have taken place at TMI-1 since the accident? Explain in detail the bases and identify any documentation that you rely on to support this aspect of your contention.

Contention 13

On pages C1-16 and C6-5 through C6-7 (including references), the Staff evaluates licensee's program for operator training. After reviewing this evaluation, please answer the following questions.

- 13-1 Do you believe that the operator training program initiated at TMI-1 since the accident at TMI-2 as described in the Restart Report and analyzed by the Staff in the SER is adequate to ensure that TMI-1 can be operated safely? If not, explain in detail the reasons for your belief and identify the documents which support your position.
- 13-2 Do you believe the Staff's evaluation of the licensee's compliance with the Order items concurred with operator training (refer to pages C6-5 and C6-6) is inadequate in any way? If so, describe in detail each of those inadequacies and identify the documents which support your position.