

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
MARJORIE M. AAMODT

Pursuant to 10 C.F.R. § 2.740b, the following interrogatories are directed to Marjorie M. Aamodt. 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.

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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

Lucinda Low Swartz
Counsel for NRC Staff

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

MARJORIE M. AAMODT

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 2
 - b. Contention 4
 - c. Contention 5
 - d. Contention 8

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 2
 - b. Contention 4
 - c. Contention 5
 - d. Contention 8

3. If the representations made in:
 - a. Contention 2
 - b. Contention 4
 - c. Contention 5
 - d. Contention 8are 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

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:

Contention 2

- 2-1 Do you still contend that a 100% test performance of technicians and management by an independent engineering firm is necessary for the safe operation of TMI-1? If so, explain in detail the reasons for your belief and provide relevant documentation specifying your contention that: (1) a 100% test performance and (2) the test must be performed by an independent engineering firm.
- 2-2 If the answer to 2-1 is "yes," what type of
- a. technicians
 - b. management personnel
- do you believe should be tested for adequate performance of job description?
- 2-3 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.
- 2-4 Do you believe the Staff's evaluation of the licensee's compliance with the Order items concerned 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.

Contention 4

On pages C3-1 through C3-5 the Staff discusses the licensee's emergency plan. After reviewing this evaluation, please answer the following questions:

- 4-1 Do you still believe that licensee has not made provisions for the timely dissemination of information in the event of a release of radioactive particulates? (Refer to pages C3-1 and C3-2.) If so, explain in detail the reasons for your belief and identify the documents which support your position.
- 4-2 What time period do you consider "timely?" Provide the basis for your response.
- 4-3 What measures, other than those described in the emergency plan and evaluated in the SER, do you believe the
- a. NRC
 - b. Licensee
 - c. Commonwealth of Pennsylvania
 - d. Counties of Dauphin, York, and Lancaster
- should take to ensure timely information is made available to the public in the event of a release of radioactive particulates? Provide the basis for your response.
- 4-4 Do you believe the Staff's evaluation of licensee's emergency plan is inadequate in any way? If so, describe in detail each of those inadequacies and identify the documents which support your position.

Contention 8

On pages C4-1 through C4-11 and C5-1 through C5-8, the Staff discusses the waste management systems at TMI and the separation of Unit 1 from Unit 2. After reviewing this evaluation, please answer the following questions:

- 8-1 Do you agree with the Staff's conclusions on pages C5-6, C5-7 and C5-8 that the waste management systems (liquid, gaseous, and solid systems and effluent monitoring system) at TMI-1 do not rely on operations at TMI-2? If not, explain in detail all of your points of disagreement and identify the documents which support your position.
- 8-2 Do you believe the waste handling capability at TMI-1 as described in the Restart Report and analyzed in the SER is adequate to ensure the safe operation of TMI-1? If not, explain in detail the reasons for your belief and identify the documents which support your position.
- 8-3 Do you believe the Staff's evaluation of licensee's compliance with Order item 5 is inadequate in any way? If so, describe in detail each of those inadequacies and identify the documents which support your position.