

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

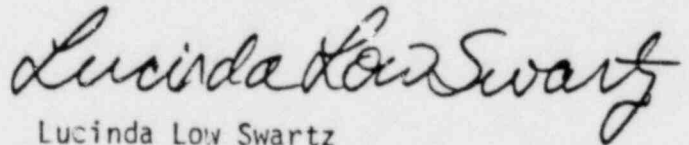
SECOND SET OF NRC STAFF INTERROGATORIES OF  
STEVEN C. SHOLLY

Pursuant to 10 C.F.R. § 2.740b, the following interrogatories are directed to Steven C. Sholly. 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

STEVEN C. SHOLLY

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 1
  - b. Contention 2
  - c. Contention 3
  - d. Contention 4
  - e. Contention 5
  - f. Contention 6
  - g. Contention 7
  - h. Contention 8
  - i. Contention 9
  - j. Contention 10
  - k. Contention 11
  - l. Contention 13
  - m. Contention 14
  - n. Contention 15
  - o. Contention 16
  - p. Contention 17
  
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 1
- b. Contention 2
- c. Contention 3
- d. Contention 4
- e. Contention 5
- f. Contention 6
- g. Contention 7
- h. Contention 8
- i. Contention 9
- j. Contention 10
- k. Contention 11
- l. Contention 13
- m. Contention 14
- n. Contention 15
- o. Contention 16
- p. Contention 17

3. If the representations made in:

- a. Contention 1
- b. Contention 2
- c. Contention 3
- d. Contention 4
- e. Contention 5
- f. Contention 6
- g. Contention 7

- h. Contention 8
- i. Contention 9
- j. Contention 10
- k. Contention 11
- l. Contention 13
- m. Contention 14
- n. Contention 15
- o. Contention 16
- p. Contention 17

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 licensee's emergency plan is evaluated by the Staff on pages C3-1 through C3-5. After reviewing this evaluation please answer the following questions:

Contention 4

- 4-1 Do you still believe that licensee's provision for offsite monitoring as described in the emergency plan and evaluated in the SER (see pages C3-2 and C3-3) limits the ability of licensee to provide accurate and timely radiation exposure and dose estimates to the public? If so, describe in detail the basis for your belief and identify the documents which support your position.

Contention 8

- 8-1 Do you still believe that the communication links with federal, state, and local governments and offsite support personnel are inadequate? If so explain in detail the basis for your belief and identify the documents which support your position (refer to pages C3-2 and C3-3).
- 8-2 What other information would you need to determine that the communication links for TMI would be sufficient in the event of an accident?
- 8-3 Do you still believe that licensee has failed to provide a sufficient number of operational and properly calibrated radiation monitoring devices along with qualified personnel to operate the equipment in the event of an emergency? (Refer to pages C3-2 and C3-3.) If so, explain in detail the basis for your belief in this regard.
- 8-4 In your opinion, what would be a sufficient number of radiation monitoring devices? Explain in detail the basis for your opinion and identify the documents which support your position.
- 8-5 Do you still believe that hospital and medical personnel are not qualified or prepared to accommodate radiological emergencies? (Refer to page C3-3.) If so, explain in detail your reasons for this belief identify the documents which support your position.
- 8-6 Do you still believe the licensee's emergency classification scheme contains inappropriate emergency action levels? (Refer to page C3-1.)
- 8-7 In your opinion, what classification scheme would be appropriate? Explain in detail the basis for your opinion and identify the documents which support your position.
- 8-8 Do you still believe that licensee's emergency plan is not sufficiently coordinated with state and local emergency plans? If so, explain in



detail the basis for your belief and identify the documents which support your position. (Refer to page C3-2).

- 8-9 Do you believe that the Staff's evaluation of the 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 9

- 9-1 Do you still believe that licensee's radiation monitoring program is inadequate because of insufficient monitoring sites and equipment in the vicinity of TMI? If so, explain in detail the reasons for your belief and identify the documents which support your position. (Refer to pages C3-2 and C3-3.)
- 9-2 What specific monitoring sites and types of equipment would you consider adequate for offsite radiation monitoring which would provide useful information and protect the public?
- 9-3 Do you still believe that licensee does not possess adequate portable radiation monitors to provide additional information in the event of a radiation release? If so explain in detail the reasons for your belief and identify the documents which support your position. (Refer to pages C3-2 and C3-3.)
- 9-4 Do you still believe that licensee's radiation monitoring program must be upgraded prior to restart of TMI-1? If so, describe in detail the measures you believe licensee should take to upgrade the radiation monitoring program to the degree sufficient to protect the public health and safety and identify the documents which support your position. (Refer to pages C3-2 and C3-3).

Contention 10

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

- 10-1 Do you still believe that events at TMI-2 may impact upon the safe operation of TMI-1? If so, explain in detail the basis for your belief and identify the documents which support your position.
- 10-2 If the answer to 10-1 is "yes," describe in detail the events at TMI-2 which you believe could impact upon TMI-1 and the resultant effects at TMI-1.
- 10-3 Do you still believe that events at TMI-1 may impact upon the continued safe decontamination of TMI-2? If so, explain in detail the basis for your belief and identify the documents which support your position.
- 10-4 If the answer to 10-3 is "yes," describe in detail, the events at TMI-1 which you believe could impact upon the decontamination of TMI-2 and the resultant effects at TMI-2.
- 10-5 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.
- 10-6 If the answer to 10-3 is "no," describe all possible accident scenarios at TMI-1 for which you believe there would be inadequate storage water capacity.



- 10-7 Do you agree with the Staff's conclusions on pages C5-6, C5-7, and C5-8 that the waste handling systems (liquid, gaseous, and solid, and effluent monitoring systems) 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.
- 10-8 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.
- 10-9 Do you believe the Staff's evaluation of licensee's compliance with Order items 4 and 5 is inadequate in any way? If so, describe in detail each of those inadequacies and identify the documents supporting your position.

Contention 14

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:

- 14-1 Specify the alleged violations by the licensee of NRC regulations and technical specifications during the TMI-2 accident that are not adequately addressed in the SER and which you contend demonstrate the licensee's inability to competently manage the operation of TMI-1. Explain in detail the basis for your contention and identify the documents which support your position.

- 14-2 What specific measures do you believe licensee should take in order to ensure that it is competent to manage TMI-1?
- 14-3 Do you believe 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 manage the operation of TMI-1?
- 14-4 Do you believe that regardless of the 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.
- 14-5 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.