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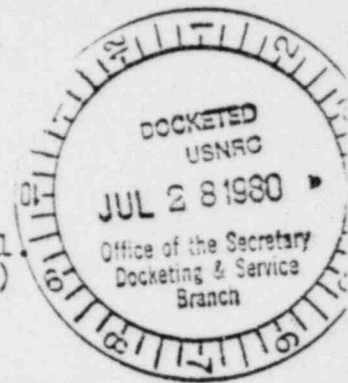
RELATED CORRESPONDENCE AAMODT 7/23/80

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 Nuclear Station, Unit No. 1)

Docket No. 50-289 (Restart)



AAMODT RESPONSE TO SECOND SET OF NRC INTERROGATORIES

My husband, Norman Aamodt, spoke with Mr. James A. Tourtellotte Esquire of NRC legal staff to request an extension of time in which to make this response until July 23, 1980 in the absence of Mr. Ivan W. Smith, Esquire from his office last week. Mr. Tourtellotte had no objection to this request.

I object to General Interrogatories 1 through 3 on the basis of untimeliness. They inquire into general discovery matters, time for which is long since past. I understand that the only acceptable interrogatories at this point, unless specially permitted by the Board, are those concerning NUREG-0680 and the Restart Report.

Response to Interrogatory 2-1:

Contention is continued that 100% test performance of technicians be made by an independent engineering firm and that this is necessary to assure safe operation of TMI-1. The key word in the Board Order was "assurance". The requirement of "assurance" makes independent verification necessary.

Why would NRC select 90% as an acceptable grade on the special exam (TMI-2 accident sequences) p. C1-16? What material included in the exam would not be necessary for an operator to know? I contend that all parts of the exam and all other exams should be answered completely and correctly as an initial indication that the material presented was mastered. In order to achieve 100% test score, "overlearning" is generally required. There are many experiments in the body of learning theory which show that where there is "overlearning" there is greater retention as a function of time. "Overlearning" also provides for more

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correct responses during periods of stress.

2-2: All

2-3:

I would prefer not to believe, but to know whether the operator training program initiated at TMI-1 is adequate. The only way we can know that training is adequate is through test evaluation of operators' responses in a variety of situations that simulate all possible predictable events. That test evaluation needs to be made by people who understand the function of testing in predicting performance.

2-4:

I object to the word "believe". I studied human behavior as a scientist, trained in mathematical analysis, testing techniques and measurement of physical and mental characteristics of human beings.

I do not find NRC's evaluation of the licensee's proposed retraining either adequate or informative. For instance, there is no analysis of how the station training department was increased other than in size, assuming the bigger is better. There is no analysis of the qualifications of Personnel Qualification Services, the independent consultant chosen by Met Ed. The final paragraph on p. C6-7 under Training of Operating Staff is a leap of faith in an area for which the tools of evaluation have been available for some time.

4-1 through 4-4 deal with emergency planning. I need to study the revised emergency plan in more detail before answering.

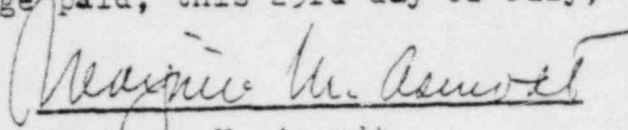
8-1 through 8-3: No response as this contention should be withdrawn as the area of major concern was not considered as included in the Board's interpretation on acceptance.

Respectfully submitted,

Marjorie M. Aamodt

*Marjorie M. Aamodt*  
July 23, 1980

I hereby certify that copies of AAMODT RESPONSE TO SECOND SET OF NRC INTERROGATORIES dated July 23, 1980 were served upon those persons on the Service List below by deposit in the United States mail, postage paid, this 23rd day of July, 1980.

  
Marjorie M. Aamodt

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