

SHOLLY, 7/9/80

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

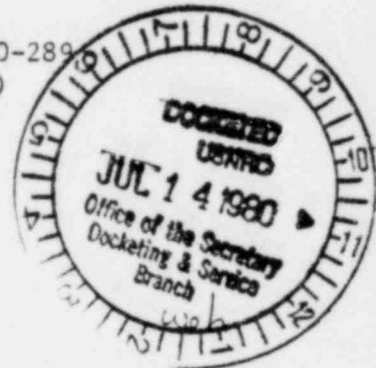
Before the Atomic Safety and Licensing Board

In the Matter of

METROPOLITAN EDISON COMPANY, et al.

(Three Mile Island Nuclear
Station, Unit No. 1)

Docket No. 50-289
(RESTART)



INTERVENOR STEVEN C. SHOLLY
RESPONSE TO NRC STAFF
INTERROGATORIES DATED 7/1/80

Intervenor Steven C. Sholly herein responds to interrogatories served by NRC Staff in a filing dated 7/1/80, received 7/7/80. It should be noted that interrogatories #1, #2, and #3 were objected to in a previous filing served via Licensee's distribution system on 7/9/80. Responses herein pertain only to material contained in the Staff's "SER" which was served on 6/16/80, as per Board Memorandum and Order dated 5/22/80.

INTERROGATORY 4-1

The Licensee was found to have inadequate stocks of operable portable radiation monitoring equipment, poor calibration preparedness, and had not provided adequate training for potential members of radiation monitoring teams in the use of the various radiation monitoring instruments by numerous investigations. SEE NUREG-0600, pages II-1-18 through II-1-22, II-1-34 through II-1-37, pages II-1-42 through II-1-47, pages II-3-71 through II-3-90, pages II-3-94 through II-3-99. SEE also NUREG-0616, pages 104-106, pages 53-56, pages 119-120. Licensee was cited in these studies also for failures to maintain adequate records of environmental monitoring results, particularly results radioed to the facility from off-site monitoring teams.

8007170210 G

Licensee has upgraded its REMP, mostly in the area of TLD monitoring stations and provision for mobile radiation monitoring laboratory facilities. It is not clear that a number of deficiencies noted after the TMI-2 accident have been corrected. These are:

- a. Calibration problems with environmental TLD's, noted in the Report of the Task Group on Health Physics and Dosimetry to the President's Commission on the Accident at Three Mile Island, especially in the Appendices to that report.
- b. Inadequate stocks of operable portable radiation monitoring instruments, including beta and gamma monitors, particulate detection systems, and radioiodine monitoring instruments (as noted in Task Group report cited above and also in NUREG-0600 and NUREG-0616).
- c. Training problems for radiation monitoring team members and TLD readers (as noted in previously cited references).
- d. Excessive response time in confirming off-site dose predictions (NUREG-0600, pages II-3-71 through II-3-79, and pages II-3-94 through II-3-97).
- e. Problems with use of radiation survey instruments and reporting of radiation dose readings (NUREG-0600 at pages II-3-96 through II-3-97).

In addition, during the recent TMI-2 containment atmosphere purge to remove Kr-85 and other radionuclides from the atmosphere inside the containment building, numerous problems were encountered with in-plant radiation monitors. Field monitoring instruments were also subject to mechanical and component failures. It is not clear what the causes of these problems have been, but it cannot be excluded that inadequate maintenance and calibration of the instruments contributed to these

difficulties.

In sum, this Intervenor's position regarding limitations on Licensee's ability to provide timely and accurate estimates of radiation exposure and dose estimates remains unchanged by either Licensee's emergency plan or the Staff's evaluation in the "SER".

Finally, it should be noted that until the high-range effluent monitor system is installed and operational, there remains an additional liability in determination of off-site doses, because under certain accident conditions, the existing radiation monitors will read off-scale. There are also problems with false readings (i.e., recent troubles with noble gas and particulate monitors at TMI-2, and false readings on effluent radioiodine instrumentation) which can lead to misleading radiation dose estimates.

All of these problems contribute to the problem identified by Contention #4.

INTERROGATORY 8-1

Staff's evaluation of off-site communications links with federal, state and local governments and offsite support personnel is so sketchy and lacking in detail that it is impossible to evaluate the adequacy of these links based on information in the "SER".

Based on information in Licensee's Emergency Plan and the "Restart Report", I find the links adequate for normal conditions. In my opinion, there still remains doubt about the adequacy of these links during abnormal conditions (i.e., power failures, adverse weather, storm-related damage, etc.). Since to the best of my knowledge there exist no evaluations of these communications links other than the "SER", and documents prepared by Licensee and the Commonwealth, it is not possible to cite documents which support this position. It is inconceivable that the Staff, the

SHOLLY, 7/9/80

Licensee, and the Commonwealth would undertake reviews of their communications links with one another and then publish critical reports on these links. An independent assessment of the adequacy of these communications links by qualified reviewers would have the potential for resolution of remaining doubts concerning the referenced communications links.

INTERROGATORY 8-2

See response to 8-1. In addition the following information would be useful in determining the adequacy of communications links:

- a. Descriptions of the communications transmitting and receiving equipment of the local governments, including backup power sources and alternate means of notification.
- b. Descriptions of provisions for reaching key individuals or their alternates at all times of day and on weekends and holidays.
- c. Additional information on the impact of tie-ups in public communications facilities on the notification process, particularly at the local government level.

INTERROGATORY 8-3

Staff's treatment of this issue in the "SER" is minimal to non-existent. Re-evaluation of my position based on the information presented therein is impossible. Absent an evaluation specifically addressing these issues in sufficient detail, my position remains unchanged.

INTERROGATORY 8-4

Objection. This interrogatory is general in nature, and is not specifically referenced with any material in the SER.

INTERROGATORY 8-5

Again, Staff's evaluation in the "SER" of this issue is minimal and lacks sufficient detail. No qualifications for such personnel are provided, no requirements for such qualifications are referenced for comparison with existing qualifications, no numbers of such persons are provided, there is no evaluation of how many such persons would be needed in a serious accident, nor is there any evaluation of the transportation of such persons to the referenced facilities for treatment.

Lack such information and evaluations from the Staff, I am unable to make a further evaluation of this issue. Therefore, my position remains unchanged.

INTERROGATORY 8-6

The referenced page in the "SER" contains no explicit information on the emergency action levels. There are several documents referenced in the "SER" which may contain such information. Inasmuch as these were the documents upon which, in part, this contention was based, and given that Staff has provided no new information in the "SER", my position remains unchanged.

INTERROGATORY 8-7

Objection. This is a general interrogatory which is not specifically referenced with any material in the "SER". Further, this interrogatory, as is the case with 8-4, could have and should have been posed during general discovery.

INTERROGATORY 8-8

Information in Staff's "SER" is useless in re-evaluating this problem.

SHOLLY, 7/9/80

Simply because the Staff takes a position on an issue is no cause for an intervenor to automatically change his position, especially in the lack of specific information which addresses the issues involved. Simple conclusory statements by the Staff provide an insufficient basis for re-evaluation of the problem. Inasmuch as issues relating to emergency planning are currently suspended, and since I have not had sufficient opportunity to review the revisions to the Licensee's Emergency Plan, I am not in a position to respond in more detail.

INTERROGATORY 8-9

If I am to base the response to this interrogatory on the material contained in the "SER" (a total of 4½ pages), my response is an unqualified yes. There is no issue related to emergency planning which is sufficiently evaluated in the "SER". The "SER" contains conclusory statements regarding the Staff's opinion of Licensee's emergency plan. No bases for these conclusion are given in the "SER".

Frankly, this portion of the "SER" reads like a press release from the utility for mass consumption. The Staff's evaluation of the Licensee's emergency plan is utterly lacking in depth and detail. No evaluation is included of the Emergency Plan Implementing Procedures which are the heart and soul of the emergency plan, since these procedures contain the detailed steps which are taken to implement the more general information in the emergency plan.

It is this intervenor's fervent hope that the Staff will reconsider this pitiful attempt at evaluating Licensee's emergency plan, and issue a much more detailed supplement. It is utterly appalling and inconceivable to think that the Staff could purport to completely evaluate Licensee's emergency plan, which together with supporting plans of state and local

governments and the emergency plan implementing procedures consists of several thousand pages of written materials and diagrams, in four and one-half pages of double-spaced typewritten language.

INTERROGATORY 9-1

There is in the "SER" insufficient information upon which to base a re-evaluation of my position on this issue. The material contained herein is nearly devoid of detailed evaluative material on Licensee's radiation monitoring program. Improvements in the TLD program are noted, but poorly detailed. My main concerns lie in the realm of the sufficiency of detecting both gamma and beta radiation, the sufficiency of the number of sites and their locations with respect to population centers, and the types and numbers of special radiation monitoring being performed (i.e., gamma isotopic analysis of food, water, soil, and plant samples; noble gas sampling, etc.). With regards to these and other concerns, the Staff's evaluation is nearly silent. The evaluation is also silent on any program contemplated for periodic review of results and provision for changes in the program.

INTERROGATORY 9-2

Objection. Again, this is a general interrogatory, time for which is long since past. This interrogatory is untimely, and therefore will not be responded to.

INTERROGATORY 9-3

Staff's discussion in the "SER" on this matter is insufficient to make any re-evaluation of this issue. To the extent that this interrogatory seeks information beyond the scope of the "SER" it is objected to.

INTERROGATORY 9-4

The "SER" contains no information which useful to make a re-evaluation of this issue. To the extent that this interrogatory seeks discussion beyond the "SER" is is objected to.

INTERROGATORY 10-1 through and including 10-9

This contention was withdrawn by filing dated 6/5/80 to which Staff has yet to respond. Inasmuch as the contention is withdrawn, no responses are required to these interrogatories.

INTERROGATORY 14-1

Contention 14 has been considerably modified by the filing of 6/5/80. Staff has indicated, through Licensee's counsel (Mr. Blake) that the new form of the contention is acceptable. To the extent that this interrogatory requests information concerning contention 14 as originally submitted, there is no need to answer since this issue is no longer depended upon as a basis for the contention, and will not be addressed by this intervenor in either direct testimony or cross-examination.

INTERROGATORY 14-2

Objection. This is a general interrogatory which has nothing to do with the "SER". The interrogatory is untimely and will not be responded to.

INTERROGATORY 14-3

Yes, but not sufficiently to assure safe operation of TMI-1, at least based upon information available as of this date.

SHOLLY, 7/9/80

INTERROGATORY 14-4

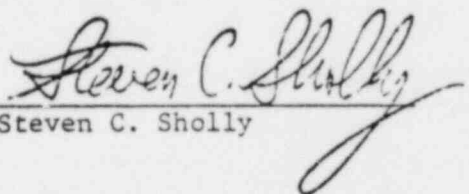
No. However, sufficient changes must be made prior to Restart in order to permit such a finding (i.e., competence to operate TMI-1) to be made.

INTERROGATORY 14-5

It is inadequate to the extent that it takes the position that there have been sufficient changes made with respect to managerial capability and resources available to operate TMI-1 to assure safe operation of TMI-1. The evaluation by Staff is admittedly incomplete (SEE "SER", page C6-1, second paragraph).

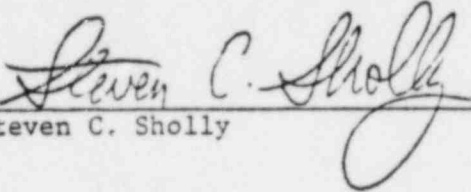
DATED: 9 July 1980

RESPECTFULLY SUBMITTED,


Steven C. Sholly

AFFIDAVIT:

STEVEN C. SHOLLY, being duly sworn according to law, deposes and says that the statements made in INTERVENOR STEVEN C. SHOLLY RESPONSE TO NRC STAFF INTERROGATORIES DATED 7/1/80 are true and accurate to the best of his knowledge and belief.


Steven C. Sholly

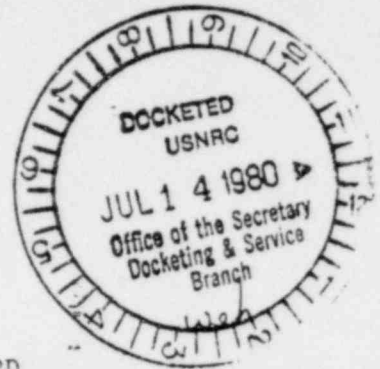
Sworn to and subscribed
before me this 9th day
of July, 1980.


Notary Public

Patricia Jo Bowman, Notary Public
My Commission Expires March 19, 1984
Harrisburg, Pa. Dauphin County

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

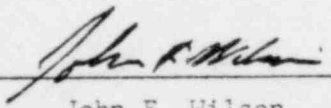


In the Matter of)
METROPOLITAN EDISON COMPANY)
(Three Mile Island Nuclear)
Station, Unit No. 1)

Docket No. 50-289
(Restart)

CERTIFICATE OF SERVICE

I hereby certify that copies of Intervenor Steven C. Sholly Response to NRC Staff Interrogatories Dated 7/1/80 dated July 9, 1980, which was hand delivered to Licensee at Three Mile Island Observation Center, Middletown, Pennsylvania, on July 10, 1980, were served upon those persons on the attached Service List by deposit in the United States mail, postage paid, this 11th day of July, 1980.


John F. Wilson

Dated: July 11, 1980

DS03
S
0/1