

RELATED CORRESPONDENCE

POOR ORIGINAL

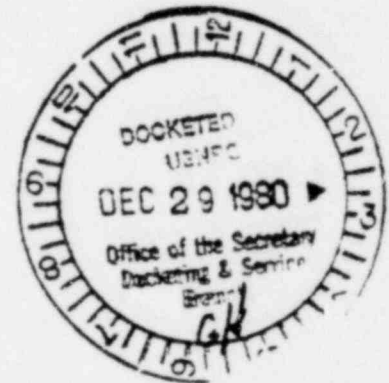
R. D. 5, Box 428
Coatesville, Pennsylvania 19320

December 15, 1980

Ivan W. Smith, Esquire
Chairman
Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. Walter H. Jordan
Atomic Safety and Licensing Board Panel
881 West Outer Drive
Oak Ridge, Tennessee 37830

Dr. Linda W. Little
Atomic Safety and Licensing Board Panel
5000 Hermitage Drive
Raleigh, North Carolina 27612



Dear Board Members:

On Wednesday, December 10 further discovery on my contention 2 was pursued by way of a conference call initiated by Daniel Swanson, Counsel for NRC Staff. Several others of the Staff participated as well as Mr. Blake representing the Licensee.

I was asked to indicate the specific areas within contention 2 which I intended to pursue in the hearing. I indicated that they were adequacy of testing of control room operators as a predictor of performance of these operators under various conditions of stress, fatigue and attitude, and the validity of changes in training proposed by the Licensee.

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The Licensee, according to Mr. Blake, is requesting submittal of written testimony by December 22 and readiness for trial by January 6. These dates, if granted, would prohibit my participation in the hearing relative to training and testing.

Although considerable time has elapsed since the acceptance of contention 2 by the Board, 'discovery' has been ongoing. I was hopeful until the recently published evaluation of the Staff that the areas of my concern regarding training and testing would be addressed by the Staff, thereby making any further effort on my part unnecessary. That has not happened. The Staff indicated in their supplement to their response to restart that they were satisfied with the Licensee's proposed training and testing program, as they had indicated earlier in their evaluation. However, their evaluation appears to be based on opinion rather than precise standards. This was pointed out in my response (10/15/80) to Staff interrogatories inquiring why I considered that the Licensee still had not met the stipulations of contention 2. Neither the Licensee in their program or the Staff in their original evaluation or in their supplement provide any evidence that the changes in the training and testing will indeed result in improved performance by control room operators. Mr. Blake indicated that 'assurance' will be provided by an independent engineering firm in written testimony. It would be too late at that time for me to obtain witnesses if the testimony of the engineering firm appears to be in error. It would seem that the Licensee should have been willing to provide this information subsequent to our discovery of December 10. If this was the intention of the Board, I motion that the Licensee be compelled to provide this information prior to submittal of testimony.

During discovery on December 10, I requested and Mr. Swanson

agreed to supply a number of documents that would be helpful to me in preparing to represent contention 2. None of those documents have arrived.

I am therefore requesting that the date for submittal of testimony on training and testing issue be extended until February 2 at the earliest. This is assuming that the documents to be provided by the Staff will arrive by January 5, thereby allowing three weeks for study and preparation and a week for mailing.

At one point in the prehearing conferences, training and testing were~~not~~ included with management issues. While training and testing must fall under the purview~~of~~ management, the design of a training and testing program should be the responsibility of technically trained "human engineers". This is the thrust of contention 2, and it was accepted, so stated, as relevant and litigable in this hearing. To hear contention 2 in the light in which it was framed, apart from management issues, would appear proper and would not detain the hearing of those issues.

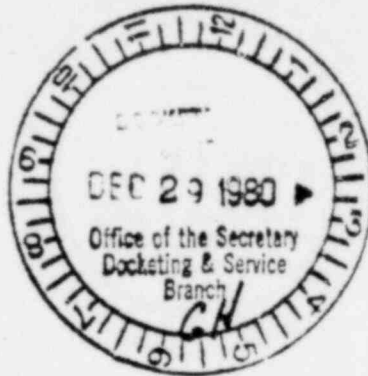
I would also like to bring again to the Board's attention my opinion that contention 2 deserves more adequate representation than I will be able to make. Although if given time, I will make every effort within my means to defend the areas contended, my means are limited. Continuing in the hearing has been a considerable burden since intervenor funding and legal assistance have been denied. Risk analysts have targeted "human error" as^a highly probably cause of a future major accident. Training is acknowledged to have an effect on reducing human errors. The changes in training proposed by the Licensee are being put forth as meaningful in the sense of reducing future human errors. The Staff is evidently willing to accept changes as improvements without scientific evaluation or

at least not articulating that evaluation. The Licensee has hired an 'evaluator', whether in response to contention 2 or because of their own cognizance is not known. The question is whether the testimony of the Licensee's evaluator will have to stand against more than my cross-questioning, or others with even less knowledge and experience in human engineering, or whether the Board will provide experts in the field of human engineering -- highly qualified and independent of the Licensee -- to assure that the Licensee's program is the best it can be, to protect the health and safety of the public. I, therefore, motion that the Board provide assistance as described above so that I; and the public, can be assured that the training and testing program at TMI Unit 1 has been adequately and independently evaluated.

Respectfully submitted,

Marjorie Aamodt
Marjorie Aamodt

December 18, 1980



R. L. 5, Box 428
Coatesville, Pennsylvania 19320

December 18, 1980

RE: Training and Testing Contention

In the Matter of
Metropolitan Edison Company, et al.
(Three Mile Island Nuclear Station, Unit 1)
Docket No. 50-289 -(Restart)

Ladies and Gentlemen:

The attached letter was served on the Board Panel, the Docketing and Service Section of the U. S. Nuclear Regulatory Commission, Mr. Tourtellotte of the U. S. Nuclear Regulatory Commission and Mr. George F. Trowbridge of Shaw Pittman, Potts & Trowbridge and counsel for Metropolitan Edison Company or their representatives in Harrisburg on December 19, 1980.

Sincerely,

Margorie Aamodt
Margorie Aamodt

Intervenor, Three Mile Island
Restart Hearing

Service by mail, December ~~17~~, 1980 to parties on attached Service List instead of as above, due to change in time of meeting and conflict with prior appointment. The express delivery service was unable to find our home and delivery of NUHAG-0746 was made ^{DEC 18} yesterday, afternoon late.* I intend to speak with Joseph Gray, Counsel for NRC, about subsequent discovery on this document as a quick perusal leaves many unanswered questions. Not allowing the change in time, I would have been unable to prepare for the December 19 meeting due to the late arrival of the evaluation.

Margorie Aamodt

12/22/80

*copy of delivery receipt attached

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EXCELLENT

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