RELATED CORRESPONDENCE

## SHAW, PITTMAN, POTTS & TROWBRIDGE

1800 M STREET, N. W. WASHINGTON, D. C. 20036

RAMSAY O POTTS
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R TIMOTHY HANLON
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FRED A LITTLE
JOHN B RHINELANDER
BRUCE W CHURCHILL
LESLIE A NICHOLSON JR
MARTIN D KRALL
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JAY E SILBERG
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JOHN ENGEL DEAN D. AULICK
JOHN ENGEL
STEPHEN B HUTTLER
WINTHROP N. BROWN
JAMES B HAMLIN
ROBERT E ZAHLER
RICHARD E GALEN
ROBERT B ROBENS
STEVEN M. LORS

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COMMISSION

89-2693 SHAWLAW WSH CABLE SHAWLAW MATERS DIRECT DIAL NUMBER

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VICTORIA J PERKINS JOHN H O'NEILL JR
JAY A EPSTIEN
RAND L ALLEN
TIMOTHY B MCBRIDE
ELISABETH M PENDLETON ELISABETH M PENDLETO
PAUL A KAPLAN
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NUV 1 NOVEMBER REGULATORS NOVEMber 6, 1981

Administrative Judge Gary L. Milhollin Atomic Safety & Licensing Board 1815 Jefferson Street Madison, Wisconsin 53711

DOCKERED USNEC NOV 1 0 1981 Office of the Secretary Docketing & Service Branch

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

Dear Judge Milhollin:

I enclose several documents which are being provided for the following reasons:

- 1. A chart which describes by participants and dates the various NRC and Licensee examinations administered to TMI-1 operators, which have been the subject of discovery and which will be discussed during the reopened hearing. You requested that Licersee develop this chart as an aid to the participants during the hearing when reference to particular exams is necessary.
- Affidavits in support of Licensee's responses to discovery requests. With the press of providing timely responses to discovery requests, Licensee did not complete and coincidentally provide affidavits in support of its interrogatory responses. Affidavits which we indicated with our discovery responses would subsequently be provided, are enclosed.



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Administrative Judge Gary L. Milholl A November 6, 1981 Page Two

3. Kelly-administered examination of Mr. V. In our earlier discovery responses, we indicated that one examination from the Kelly-administered exams in April, 1980, had not been located. The missing examination has been found and is enclosed.

This also will confirm that in response to a request from the Aamodts, Licensee is distributing today under separate cover (directly from the TMI site) some twenty completed RWP examinations radomly selected from the period April 15 to May 15 (but excluding April 28), 1979.

Sincerely,

Smot t. Bloks, fr.

Ernest L. Blake, Jr. Counsel for Licensee

cc: (w/encl.) Reopened Hearing Discovery Service List (attached)

Service List (attached)

(w/out TMI-1 Restart Service List

encl.) (attached)

#### Before the Special Master

In the Matter of	
METROPOLITAN EDISON COMPANY	Docket No. 50-289 SP
(Three Mile Island Nuclear ) Station [init No. 1)	(Restart)

#### SERVICE LIST

Administrative Judge Ivan W. Smith (2) Chairman, Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Administrative Judge Walter H. Jordan Atomic Safety & Licensing Board Post Office Box 2357 881 West Outer Drive Oak Ridge, Tennessee 37830

Administrative Judge Linda W. Little Atomic Safety & Licensing Board 5000 Hermitage Drive Raleigh, North Carolina 27612

Administrative Judge Gary L. Milhollin Atomic Safety & Licensing Board John Clewett, Esquire 1815 Jefferson Street Madison, Wisconsin 53711

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Robert Adler, Esquire Karin W. Carter, Esquire Assistant Attorney General 505 Executive House Harrisburg, PA 17120

Ms. Louise Bradford TMI ALERT 1011 Green Street Harrisburg, PA 17102

Norman Aamodt R. D. 5 Coatesville, PA 19320

The Christic Institute 1324 N. Capitol Street Washington, D.C. 20006 (TMI-1 Restart Service List--Reopened Hearing)

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

#### Before the Special Master

In the Matter of	
METROPOLITAN EDISON COMPANY	Docket No. 50-289 SP
(Three Mile Island Nuclear ) Station, Unit No. 1)	(Restart)

#### SERVICE LIST

Administrative Judge Ivan W. Smith (2) Chairman, Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Post Office Box 2357 Washington, D.C. 20555

Administrative Judge Walter H. Jordan Atomic Safety & Licensing Board 881 West Outer Drive Oak Ridge, Tennessee 37830

Administrative Judge Linda W. Little Atomic Safety & Licensing Board 5000 Hermitage Drive Raleigh, North Carolina 27612

Administrative Judge Gary L. Milhollin Atomic Safety & Licensing Board 1815 Jefferson Street Madison, Wisconsin 53711

James R. Tourtellotte, Esq. (4) Office of Executive Legal Director U.S. Nuclear Regulatory Commission Washington, D.C. 20555

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Attorney General of New Jersey Attn: Thomas J. Germine, Esquire Deputy Attorney Gene. al Division of Law - Room 316 1100 Raymond Boulevard Newark, New Jersey 07102

John A. Levin, Esquire Assistant Counsel Pennsylvania Public Utility Commission Post Office Box 3265 Harrisburg, PA 17120

John E. Minnich Chairman, Dauphin County Board of Commissioners Dauphin County Courthouse Front and Market Streets Harrisburg, PA 17101

Walter W. Cohen, Esquire Consumer Advocate Office of Consumer Advocate 1425 Strawberry Square Harrisburg, PA 17127

Chairman, Atomic Safety & Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Chairman, Atomic Safety & Licensing Appeal Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Jordan D. Cunningham, Esquire William S. Jordan, III, Esquire Fox, Farr & Cunningham 2320 North Second Street Harrisburg, PA 17110

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Steven C. Sholly Union of Concerned Scientists Norman Aamodt 1725 Eye Street, N.W., Suite 601 R. D. 5 Washington, D.C. 20006

Ms. Gail Phelps ANGRY 245 West Philadelphia Street York, PA 17404

Harmon & Weiss 1725 Eye Street, N.W., Suite 506 Washington, D.C. 20006

Chauncey Kepford Judith H. Johnsrud Environmental Coalition on Nuclear Power 433 Orlando Avenue State College, PA 16801

6504 Bradford Terrace Philadelphia, PA 19149

Coatesville, PA 19320

John Clewett, Esquire The Christic Institute 1324 N. Capitol Street Washington, D.C. 20006

# SUMMARY OF PRIMARY TMI-1 OPERATOR EXAMINATIONS GIVEN SINCE MARCH 28, 1979

EXAM	DATE	LOCATION	EXAMINATION ADMINISTRATOR	PURPOSE	SUBJECT MATTER	METHOD OF ADMINISTRATION	PARTICI- PANTS	
KELLY	RO-4/2-4/4/80	South-Audi- torium of TMI-I Service Building	PQS Corp.	OARP Comprehensive Exams; served as 1979-80 Requalifica- tion Exams (originally intended as NRC mock exam)	RO Categories A,A',B,C,D,E,F, G, T (as noted on cover sheet of exam)	Classroom Closed book	RO-A through HH inclusive	
	SRO-4/3 and 4/4/80	South Audi- torium of TMI-Service Building			SRO Categories H,I,J,K,L (as noted on cover sheet of exam)		SRO-A,B,E, I,J,O,P, W,X,BB,CC, EE,FF,GG	
Round 1, Non- Cat T Make-Up (Cycle 7-3)	7-8/80	TMI Classroom 2 of Training Complex	Licensee	Parts of these requal. cycle exams were used as non-cat T make-up exams for those who had received less than 80% on non Cat T areas in the Kelly exams	Unit I Requal. Training	Classroom Closed book	Wk.#1-C,D,B Wk.#2-E,F,G,UU Wk.#3-I,J,EE, M,HH,WW Wk.#4-O,P,Q,R Wk.#5-W,X,Y,AA, BB,CC Wk.#6-S,T,U,V, GG	
Round 2, Non- Cat T Make-up (Cycle 7-4)	8-9/80	TMI Classroom 2 of Training Complex	Licensee	Parts of these requal. cycle exams were used as non-cat T make-up exams for those who had received less than 80% on non Cat T areas in the Kelly exams	Unit I Requal. Training	Classroom Closed book	Wk.#2-E,F,H Wk.#3-I,J,L,M,HH Wk.#4-O,P,Q,R,OO XX Wk.#5-S,T,U Wk.#6-V,W,X,Y,Z, AA,SS	

EXAM	DATE	LOCATION	EXAMINATION ADMINISTRATOR	PURPOSE	SUBJECT MATTER	METHOD OF ADMINISTRATION	PARTICI- PANTS
Round 3, Non- Cat T Make-up (Cycle 7-5)	9-10/80	TMI Classroom 2 of Training Complex	Licensee	Parts of these requal. cycle exams were used as non-Cat T make-up exams for those who had received less than 80% on non Cat T areas in the Kelly exams	Unit I Requal. Training	Classroom Closed book	Wk.#1-A,B,C,D,Z, PP,TT*,EEE* Wk.#2-E,F,G,H, FFF*,CCG*,UU*,QQ* Wk.#3-I,J,L,HH, MM,WW Wk.#4-O,Q,R,JJ, KK,RR,YY,XX,HHH* Wk.#5-S,T,U,CG Wk.#6-V,W,X,Y,III
Round 1, Cat. T Make-Up (Cycle 7-6)	11/21/80 11/26/80 12/5/80 12/12/80 12/19/80	TMI Classroom 2 of Training Complex	Licensee	Appropriate parts of this requal. cycle exam were used as a Cat. T make-up exam for those who either had not taken the Kelly Exam or had received less than	Category T	Classroom Closed book	*answered only 1 question  11/21-LL,D,C,B, Z,A,PP,TT 11/26-G,F,H,E, KK,QQ 12/5-J,L,HH,II, NN,I 12/12-QO,R,JJ, RR,P,Q,O
Round 4, Non- Cat T Make-Up (Cycle 7-6)	2-3/81	TMI Classroom 2 of Training Complex	Licensee	During Review Program, Non-Cat T make up exams given for those who had received less than 80% in Non-Cat T areas on the Kelly exams or on previous Non-Cat T Kelly make ups	Unit 1 Requal. Training	Classroom Closed book	12/19-CG,W,MM,X, S,Y B,C,F,G,H,I,P, S,U,W,Y,Z,BB, CC,GG,R

EXAM	DATE	LOCATION	EXAMINATION ADMINISTRATOR	PURPOSE	SUBJECT MATTER	METHOD OF ADMINISTRATION	PARTICI- PANTS
Round 2, Cat. T Make-up (Cycle 7-6)	3-4/81	Unknown	Licensee	Cat. T. Make Up Exam for those who either had not taken the Cat. T exam or had taken it and received less than 90%	Category T	Take Home Closed book	EE,SS,UU,∞, H,FF,G
ATTS	RO-4/1 and 4/2/81 SRO-4/2 & 4/3/81	TMI Classrooms 1 & 7 of Train ing Complex	s ATTS, Inc.	NRC Mock Exams	RO Categories A,B,C,D,E,F,G,H (as noted on sheet of exam)	Classroom Closed book	RO-4/1-X,EE, B,FF,E,F,GG, BB,U,Z,C,D, UU,L,HH,NN, Q,QQ,RR,I 4/2-A,OO,R,W, O,P,SS,AA,G, H,Y,V,S,CC, DD,T
					SRO Categories I,J,K,L,M,N, (as noted on cover sheet of exam)		SRO-4/2-GG,F, E,Z,BB,FF,B, RR 4/3-U,O,P,W, EE,X,A,CC,S, DD,QQ,I
NRC	RO-4/21 and 4/23/81 SRO-4/22 and 4/24/81	TMI Classrooms 1 and 7 of Training Com- plex	s NPC	Operator License Exams	Comprehensive	Classroom Closed book	RO-4/21-V,T,CC, GG,BB,U,UU,SS, H,G,D,F,EE,FF, X,E,RR,QQ,B 4-23-L,Y,P,DD, NN,AA,C,HH,Q, O,I,A,W,S,Z, R,OO
							SRO-4/22-CC, OG, BB,U,F,EE,FF,X, E,RR,QQ,B 4/24-P,DD,O,I, A,W,S,Z

.

EXAM	DATE	LOCATION	EXAMINATION ADMINISTRATOR	PURPOSE	SUBJECT MATTER	METHOD OF ADMINISTRATION	PARTICI- PANTS
Round 3, Cat. T Make-Up	6/25/81	TMI Classroom 5 of Training Complex	Licensee	Cat. T Make-Up exam for those who had received less than 90% on previous Cat. T exams	Category T	Classroom Closed book	G,H,FF,∞
NRC	RO-10/21 and 10/22/81 SRO-10/28 and 10/29	TMI Classrooms 118 and 119 Training Bldg.		Operator License Exams	Comprehensive	Classroom Closed book	PO-10/21-B, CC,E,S,BB, EE,GG,FF,T, D,KK,A,WW, AA,H,G,C 10/22-U,P, R,RR,F,OO,V, UU,DD,Q,QC, L,I,Y,Z
							SRO-10/28-E, CC,E,S,RR,BB, FF,WW,I,Z,F 10/29-B,P,U, OG,DD,QQ,A,

KK

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )	
METROPOLITAN EDISON COMPANY )	
	Docket No. 50-289
(Three Mile Island Nuclear ) Station, Unit No. I)	(Restart)

## AFFIDAVIT OF DR. ROBERT L. LONG

DR. ROBERT L. LONG, being duly sworn according to law, deposes and says that he is Director of GPU Nuclear's Training and Education Department; that the information contained in Licensee's Response to Aamondt's Second Set of Discovery Requests of Licensee in Reopened Hearing of Cheating Incident (as Modified by Agreement) to Request 12 is true and correct to the best of his knowledge, information and belief.

Dr. Robert L. Long

Sworn to and subscribed before me this 5th day of November,

1981

Notary Public

ALICE J. HOUSE NOTARY PUBLIC OF NEW JERSEY

My commission expires My Commission Expires March 7, 1985

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	
METROPOLITAN EDISON COMPANY	Docket No. 50-289 (Restart)
(Three Mile Island Nuclear ) Station, Unit No. 1)	

#### AFFIDAVIT OF MICHAEL J. ROSS

MICHAEL J. ROSS, being duly sworn according to law, deposes and says that he is Manager of Plant Operations, TMI-1; that the information contained in Licensee's Response to Aamondt's Second Set of Discovery Requests of Licensee in Reopened Hearing of Cheating Incident (as Modified by Agreement) to Request No. 4 is true and correct to the best of his knowledge, information and belief.

Michael J. Ross

Sworn to and subscribed before me this 500 day of November, 1981

Notary Public

My Commission Expires Que 17, 1985

DARLA JEAN BERRY, NOTARY PUBLIC
MIDDLETOWN BORD, DAUPHIN COUNTY
MY COMMISSION EXPIRES JUNE 17, 1985

Member, Pennsylvania Association of Notarius

## BEFORE THE ATOMIC SFAETY AND LICENSING BOARD

In the Matter of		
METROPOLITAN EDISON COMPANY	Docket No.	50-289
(Three Mile Island Nuclear ) -Station, Unit No. 1)		

## AFFIDAVIT OF ROBERT C. ARNOLD

ROBERT C. ARNOLD, being duly sworn according to law, deposes and says that he is a senior Vice President of Metropolitan Edison Company; that the information contained in Licensee's Response to Aamodt's Follow-On Interrogatories of LIcensee Re Reopened Hearings of Cheating Incident to Requests3, 13 and 17 b and c is true and correct to the best of his knowledge.

Robert C. Arnold

Sworn to and subscribed before me

this 5 day of November, 1981

Less on erry Two. Daughin County, Pa

My Commission Expires to Commune on Expires Oct. 24 1983

-		BEFORE	THE	ATOMIC	SAFETY	AND	LICENSING	BOARD	
								2	
	In the	Matter	of		)				
METROPOLITAN EDISON COMPANY )							Docket 1	No. 50- start)	-289
		Mile Is			r )				

#### AFFIDAVIT OF ROBERT C. ARNOLD

ROBERT C. ARNOLD, being duly sworn according to law, deposes and says that he is Senior Vice President of Metropolitan Edison Company; that the information contained in Licensee's Response to Aamodt's First Set of Discovery Requests of Licensee in Reopened Hearing of Cheating Incident (As Modified by Agreement and by Rulings of the Special Master) to Issue 1, Request No. 1, and Issue 2, Request Nos. 1 and 2, is true and correct to the best of his knowledge, information and belief.

Robert C. Arnold

Cohest amold

Sworn to and subscribed before me this 5 day of November 1981.

Notary Public

CATHY L. EREY, Notary Public Components Two: Drughin County, Pa. March Strates on Express Oct. 2 | 10 3

My Commission Expires

5.	BEFORE	THE	ATOMIC	SAFETY	AND	LICENSING	BOARD .	
In the Mat	ter of			)				
METROPOLITA	AN EDISC	ON CO	DMPANY	)				
(Three Mil	e Island	d Nuc	clear	)		Docket 1 (Rest	No. 50-289 tart)	
Station,	Unit No.	. I)		)				

## AFFIDAVIT OF ROBERT C. ARNOLD

ROBERT C. ARNOLD, being duly sworn according to law, deposes and says that he is Senior Vice President of Metropolitan Edison Company; that the information contained in Licensee's Response to Aamondt's Second Set of Discovery Requests of Licensee in Reopened Hearing of Cheating Incident (as Modified by Agreement) to Requests Nos. 1, 6 and 7 is true and correct to the best of his knowledge, information and belief.

Robert C. Arnold

Sworn to and subscribed before me this Saday of November,

1981

Cathy & Brey

CATHY & EREY, Notery Furfic Londonuctry Twp., Daughtor County, Pa My Commission E pires Oct. 24, 1803

My Commission Expires\_

	BEFORE	THE	ATOMIC	SAFETY	AND	LICENSING	BOARD:
-							
in the Mati	ter of			)			
METROPOLITA	AN EDIS	ON CO	OMPANY	)		Docket No	50-289
Three Mile Station, I			clear	)			tart)

## AFFIDAVIT OF ROBERT C. ARNOLD

ROBERT C. ARNOLD, being duly sworn according to law, deposes and says that he is a Senior Vice President of Metropolitan Edison Company; that the information contained in Licensee's Response to Aamodt's Third Set of Discovery Requests of Licensee in Reopened Hearing of Cheating Incident to Request 5 is true and correct to the best of his knowledge, information and belief.

Robert C. Arnold

Sworn to and subscribed before me this 5th day of November, 1981

Notary Public

My Commission Expires My Commission Expires Oct. 24, 1983

CATHY L. BREY, Notary Public Lonconcerny Two. Daupher County. Po

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )	
METROPOLITAN EDISON COMPANY	Docket No. 50-289
(Three Mile Island Nuclear ) Station, Unit No. 1)	(Restart)

#### AFFIDAVIT OF ROBERT C. ARNOLD

ROBERT C. ARNOLD, being duly sworn according to law, deposes and says that he is a Senior Vice President of Metropolitan Edison Company; that the information contained in Licensee's Supplemental Response to Aamodt's First Set of Discovery Requests of Licensee In Reopened Hearing of Cheating Incident (As Modified by Agreement and by by Rulings of the Special Master) to Issue No. 2, Request No. 1, is true and correct to the best of his knowledge, information, and belief.

Robert C. Arnold

Sworn to and subscribed before me this 5 day

of November, 1981

Notary Public

Lon onderly Two, Dauphin County, Pa. My Commission Excites Oct. 24, 1963.

My Commission Expires\_\_\_\_\_

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )	
METROPOLITAN EDISON COMPANY	Docket No. 50-289
(Three Mile Island Nuclear ) Station, Unit No. 1	(Restart)

## AFFIDAVIT OF ROBERT C. ARNOLD

ROBERT C. ARNOLD, being duly sworn according to law, deposes and says that he is a Senior Vice President of Metropolitan Edison Company; that the information contained in Licensee's Response to TMIA's First Set of Interrogatories Addressed to Licensee (As Modified by Agreement) to Requests 1, 2, 3, 4, 9, 10, 11, 12, 40, 46, 47, 48, 49, 50, and 51 is true and correct to the best of his knowledge, information and belief.

Robert C. Arnold

Sworn to and subscribed

before me this 5th day

of November , 1981

Notary Public

CONTROL BREY, Notary Public Lear on-early Term. Designan County, Pa. My Commission Expires UCL 24, 1933

My Commission Expires

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )		
METROPOLITAN EDISON COMPANY	Docket No.	50-289
(Three Mile Island Nuclear ) Station, Unit NO. 1)		

## AFFIDAVIT OF ROBERT C. ARNOLD

ROBERT C. ARNOLD, being duly sworn according to law, deposes and says that he is a senior Vice President of the Metropolitan Edison Company; that the information contained in Licensee's Response to Aamodt's Additional Interrogatories to NRC Staff and Licensee in Reopened Hearing of Cheating Incident (As Modified by Agreement and Rulings of the Special Master) to Request No. 5 is true and correct to the best of his knowledge.

Robert C. Arnold

Sworn to and subscribed before me

this 5 day of November, 1981

Thy Brey

Notary Public Canter Type, Bausin County Pa.

My Commission Expires

My Commission Expires

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )	
METROPOLITAN EDISON COMPANY	Docker No. 50-289
(Three Mile Island Nuclear ) Station, Unit No. 1)	

#### AFFIDAVIT OF J.F. WILSON

J.F. WILSON, being duly sworn according to law, deposes and says that he is an attorney; that the information contained in Licensee's Response to TMIA's First Set of Interrogatories Addressed to Licensee (As Modified by Agreement) to Requests 5, 6, 8, 18, 20, 24, 25, 27f, 42, 43, 44, 52 and 53 is true and correct to the best of his knowledge, information and belief.

J.F. Wilson

Sworn to and subscribed before me this  $\frac{9^{+4}}{}$  day

of November, 1981

Notary Public

CATHY L BREY Wolets Middle Lounderry Two. Dauthin Dounts Parket and 1935

My Commission Expires on

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )	
METROPOLITAN EDISON COMPANY	Docket No. 50-289
(Three Mile Island Nuclear )  Station, Unit No. 1)	

#### AFFIDAVIT OF J.F. WILSON

J.F. WILSON, being duly sworn according to law, deposes and says that he is an attorney; that the information contained in Licensee's Response to Aamodt's Follow-On Interrogatories of Licensee Re Reopened Hearings of Cheating Incident to Requests 2, 6, 10, 11 and 12 is true and correct to the best of his knowledge.

J.F. WILSON

Sworn to and subscribed before me

this 4th day of November, 1981

Notary Public

CATHY L. BREY, Rotary Public Londonaterry Type. Deviction County, Pa My Commission Expires Oct. 24, 1955

·My Commission Expires\_

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	
METROPOLITAN EDISON COMPANY	Docket No. 50-289
(Three Mile Island Nuclear ) Station, Unit No. 1)	

## AFFIDAVIT OF R.D. LLOYD

R.D. LLOYD, being duly sworn according to law, deposes and says that he is an attorney; that the information contained in Licensee's Response to Aamodt's Follow-On Interrogatories of Licensee Re Reopened Hearings of Cheating Incident to Requests No. 7, 9 re telephone conversation of 9/22/81, and re grader's credentials and modified questions, and 15 re ATT's view on proctors is true and correct to the best of his knowledge.

R.D. Lloyd

Sworn to and subscribed before me

day of November, 1981

Notary

My Commission Expires

CATHY L DREY, Notary Public Londenderry Two., Daughin County, Pa. My Commission Expires Oct. 24, 1953

BEFORE THE ATOMIC SAFET	Y AND LICENSING BOARD
In the Matter of	
METROPOLITAN EDISON COMPANY	Docket No. 50-289
(Three Mile Island Nuclear ) Station, Unit No. I)	(Restart)

## AFFIDAVIT OF NELSON D. BROWN

NELSON D. BROWN, being duly sworn according to law, deposes and says that he is Supervisor, Licensed Operator Training, TMI Unit I of Metropolitan Edison Company; that the informantion contained in Licensee's Suplemental Response to Aamodt's First Set of Discovery Requests of Licensee In Reopened Hearing of Cheating Incident (As Modified by Agreement and by Rulings of the Special Master) to Issue No. 5 is true and correct to the best of his knowledge, information and belief.

Welson D. Brown

Sworn to and subscribed before me this 7 day of November, 1981

Notary Public

CATHY L. BREY, Notary Public Londonderty Two., Gauptin County, Pa. My Commission Expires Oct. 24, 1983

My Commission Expires\_

**	BEFORE	THE	ATOMIC	SAFETY	AND	LICENSING	BOARD
In the Ma	tter of			)	- 1		
5. METROPOLI	TAN EDIS	SON (	COMPANY	)			
				)		Docket No (Restar	50-289
(Three Mi Station,				)		(Resta.	

#### AFFIDAVIT OF NELSON D. BROWN

NELSON D. BROWN, being duly sworn according to law, deposes and says that he is Supervisor, Licensed Operator Training, TMI-1; that the information contained in Licensee's Response to Aamodt's Follow-On Interrogatories Of Licensee Re Reopened Hearings of Cheating Incident to Request No. 8, and to Request No. 15 except ATT's view is true and correct to the best of his knowledge, information and belief.

Nelson D. Brown

Sworn to and subscribed before

me this 4th day of

Hovember 198

(athyo Drey My Commission Expires

CALLY L. BREY, finary Public Lenionderry Two., Casp. on Case ty. Pa. My Commission Expires Oct. 24, 1963

	BEFORE	THE	ATOMIC	SAFETY	AND	LICENSING	BOARD	
In the Mati	ter of			)				
METROPOLITA	AN EDISC	ON CO	OMPANY	)		Docket 1	No. 50- estart)	
(Three Mile Station, N			clear	)				

#### AFFIDAVIT OF NELSON D. BROWN

NELSON D. BROWN, being duly sworn according to law, deposes and says that he is Supervisor, Licensed Operator Training, TMI Unit I of Metropolitan Edison Company; that the information contained in Licensee's Response to Aamodt's First Set of Discovery Requests of Licensee in Reopened Hearing of Cheating Incident (As Modified by Agreement and by Rulings of the Special Master) to Issue 5, Requests Nos.

1, 3 and 5, is true and correct to the best of his knowledge, information and belief.

Nelson D. Brown

Sworn to and subscribed before me this 4th day of November 1981.

Cathy J. Brey

Notary Jublic

regarded from the reco

My Commission Expires

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	
METROPOLITAN EDISON COMPANY )	
(Three Mile Island Nuclear )	Docket No. 50-289 (Restart)
Station, Unit No. I)	

### AFFIDAVIT OF SAMUEL L. NEWTON

SAMUEL L. NEWTON, being duly sworn according to law, deposes and says that he is Operator Training Manager, TMI - Unit I of Metropolitan Edison Company; that the information contained in Licensee's Response to Aamondt's Second Set of Discovery Requests of Licensee in Reopened Hearing of Cheating Incident (as Modified by Agreement) to Requests Nos. 5 and 8 are true and correct to the best of his know-ledge, information and belief.

Samuel L. Newton

Sworn to and subscribed before me this  $4^{+6}$  day

Notary Public

of November, 1981

CATHY L. GREY, Notary Public Londonderry Twy. Dauphin County, Pa My Commission Expuss Oct. 24, 1963

My Commission Expires\_

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket No. 50-289 (Restart)

#### AFFIDAVIT OF SAMUEL L. NEWTON

SAMUEL L. NEWTON, being duly sworn according to law, deposes and says that he is Operator Training Manager TMI Unit I of Metropolitan Edison Company; that the information contained in Licensee's Response to Aamodt's First
Set of Discovery Requests of Licensee in Reopened Hearing of Cheating Incident (As Modified by Agreement and by Rulings of the Special Master) to Issue 12, Requests Nos. 1 and 2, are true and correct to the best of his knowledge, information and belief.

Samuel L. Newton

Sworn to and subscribed

before me this 4th day

of November, 1981

CATHY L. BREY, Notary Public Londonderry Twp., Dauphin County, Pg. My Commission Expires Oct. 24, 1983

My Commission Expires

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of )	
METROPOLITAN EDISON COMPANY	Docket No. 50-289
(Three Mile Island Nuclear	
Station, Unit No. 1)	

#### AFFIDAVIT OF SAMUEL L. NEWTON

SAMUEL L. NEWTON, being duly sworn according to law, deposes and rays that he is Operator Training Manager, TMI-Unit I; that the information contained in Licensee's Response to Aamodt's Follow-On Interrogatories of Licensee Re Reopened Hearings of Cheating Incident to Request 9 re Licensee Proctors is true and correct to the best of his knowledge, information and belief.

Samuel L. Newton

Sworn to and subscribed before

me this 4th day of November, 1981

My Commission Expires My Commission Expires Oct. 24, 1983

CATHY L. BREY, Notary Public Londonderry Twp., Dauplan County, Pa.

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

METROPOLITAN EDISON COMPANY

Docket No. 50-289

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

### AFFIDAVIT OF SAMUEL L. NEWTON

SAMUEL L. NEWTON, being duly sworn according to law, deposes and says that he is Operator Training Manager,

TMI - Unit I; that the information contained in Licensee's Response to Aamodt's Follow-On Interrogatories of Licensee Re Reopened Hearings of Cheating Incident to Request No.

16 is true and correct to the best of his knowledge, information and belief.

Samuel L. Newton

Sworn to and subscribed before

ne this 4 day of November, 1981

day of November, 190

Notary Public My Comm

CATHY L. BREY, Notary Public Lendonderry Twp., Dauphin County, Pa. My Commission Expires Oct. 24, 1933

My Commission Expires

### POS CORPORATION

### REACTOR OPERATOR LICENSE EXAMINATION

Reactor Type PWR - Babcock & Wilcox

Date Administered Yould 1970

Examiner F.L. Kelly

Applicant V

Category Value		Applicant's Score	Cat. Value		
9.5	13.8	9.5	95.3	Α.	PRINCIPLES OF REACTOR OPERATION
8.0	11.7	74	97.5	A'.	PRINCIPLES OF HEAT TRANSFER AND
8.5	12.4	7.5	87.2	В.	FEATURES OF FACILITY DESIGN
8.0	11.7	64	70.6	С.	GENERAL OPERATING CHARACTERISTIC
7.5	11.0	72	910	D.	INSTRUMENTS AND CONTROLS
8.0	11.7	7.2-	90.6	E.	SAFETY AND EMERGENCY SYSTEMS
10.0	14.6	8.62	16.7	F.	STANDARD AND EMERGENCY OPERATING PROCEDURES
9.0	13.1	8.0	27.9	G.	RADIATION CONTROL AND SAFETY
68.5	100.0 N/A	7_77	N/A	T.	TMI INCIDENT AND SMALL TO BREAK CONCEPT

FINAL GRADE 70.2

#### DO'S AND DON'TS FOR EXAMS

#### DO'S

- 1. Read the questions carefully.
- 2. Note the number of points allotted to each question.
- 3. Question the examiner if in doubt.
- 4. Pace yourself don't spend hours drawing fancy sketches.
- 5. Show all calculations.
- 6. Look for any two-part questions which may not be labeled as such.
- 7. Recognize whether <u>definition</u> or <u>explanation</u> (discussion) is required.
- 8. List more than two reasons if some or few are requested.

## DON'TS

- 1. LEAVE ANY BLANKS
- 2. Read hidden meanings into the questions.
- 3. Show the examiner your answers for his concurrence.
- 4. Write your name on every sheet.

## A. PRINCIPLES OF REACTOR OPERATION (9.5)

10 P. 15 P.

- 1. The effects of Xe on are important in reactor operation.
  - a. Explain the term equilibrium Xen in. (1.0)
  - b. Discuss the effects on reactivity that would occur should the reactor be taken to power shortly <u>after</u> Xenon has peaked. (1.0)
- 2. Two identical reactors are taken to the "just critical" level. Reactor "A" has a rod speed of 50 steps per minute, while Reactor "B" has a rod speed of 25 steps per minute. (Assume continuous rod withdrawal). (1.5)
  - a. Which reactor will achieve criticality first.
  - b. Which reactor will have the highest level of source range counts at criticality.
  - c. Which will have the highest critical rod height.

Explain your answers.

- 3. Would the insertion of 0.1% ΔK/K to the reactor at 10<sup>-8</sup> amps on the intermediate range result in the same change in power level as the same insertion at 80% of full power. Explain your answer. (1.0)
- 4. a. Sketch and explain the startup recorder trace for one minute following a rod withdrawal amounting to an increase in K<sub>eff</sub> (each time) of .005 from the following initial conditions: (1.5)

I. 
$$K_{eff} = 0.9$$
, counts = 100

III. 
$$K_{eff} = 1.00$$
, counts = 5,000

- b. Calculate the SUR for case III. (0.5)
- 5. Would control rod worth be greater: (1.5)
  - a. When the moderator is at 150°F or 500°F.
  - b. When it is next to a withdrawn control rod or surrounded by inserted control rods.
  - c. When  $C_{\beta}$  is 500 ppm or 1500 ppm.

## A. PRINCIPLES OF REACTOR OPERATION (CONTINUED)

- 6. As the is operated, plutonium 239 is gradually formed uranium 238. Describe: (1.5)
  - a. The . tion process
  - b. How this formation affects reactor control

## A . PRINCIPLES OF HEAT TRANSFER AND FLUID FLOW (8.0)

- Briefly explain the following heat transfer and fluid flow terms: (2.5)
  - a. Natural circulation
  - b. Reactor coolan; saturation condition
  - c. Nucleate boiling
  - d. Sub-cooling
- The following units are used with what important nuclear and/or thermal parameters: (1.0)
  - a. KW/ft
  - b. MWD/T
  - c. KW/liter
  - d. Btu/hr-ft2
- 3. Sketch a DNB curve. Label the abscissa and ordinate and identify the various regions shown on the curve. (1.5)
- 4. a. Describe the phenomena known as "pump cavitation". (0.5)
  - b. What symptoms would alert the TMI operators to such a condition for the RCPs. (1.0)
- 5. a. With TMI-1 operating at full power what are the hottest and average fuel rod temperatures which exist in the core. (1.0)
  - b. In the event of a LOCA, what temperature should the Zircaloy clad be limited to and for what reason. (0.5)

## B. FEATURES OF FACILITY DESIGN (8.5)

- List the purpose(s) of the Makeup and Purification System. (1.5)
- Sketch a simplified system schematic diagram of the proposed HPI Cross-connect. Label components and indicate flow directions. (2.0)
- 3. Why are there two (2) vibration transducers on the DHR heat exchangers and only one (1) on the DHR pumps. (1.0)
  - 4. With regard to the Core Flood System:
    - A. Briefly describe the purpose of the system. (1.0)
    - List normal operating pressure, temperature and volume conditions. (0.5)
    - What system valves are controlled from the main control board. (0.5)
- 5. Sketch a one-line diagram of the BOP 480 volt distribution system. Indicate the systems and/or components fed by the system. (2.0)

## GENERAL OPERATING CHARACTERISTICS (8.0)

- Describe how and why the following RCS chemistry parameters are controlled during startup and full-power operation. (1.5)
  - a. Oxygen
  - b. Chlorides
  - c. pH
- 2. With regard to the EFW pumps, approximately how long will each pump require to reach full flow. (0.5)
- 3. Explain how and why the Moderator Temperature Coefficient is affected by changes in RCS boron concentration. (1.0)
  - 4. The Reactor is operating at 10% power when the turbine bypass valves for "A" SG fail open. Two (2) minutes later the operator isolates the turbine bypass valve(s). Sketch the following parameters from the initial valve failure to four (4) minutes later for: (2.5)
    - a. Reactor power
    - b. SG level
    - c. PRZ level
    - d. FW flow
  - 5. Describe the means of solid condition operation verification which operators can determine from the control room. (1.0)
  - 6. a. Describe (a formula is acceptable) how the following isotopes are formed and where they would be most commonly be found in the reactor systems: (1.0)
    - 1) N-16
    - 2) SM-149
    - 3) Krypton-85
    - b. List the half-lives of each of these isotopes. (0.5)

## D. INSTRUMENTS AND CONTROLS (7.5)

- 1. Concerning the nuclear instrumentation:
  - a. Describe the reaction by which the detectors produce a signal corresponding to neutron radiation. (1.0)
  - b. Does gamma radiation affect the signals from detector. Explain why or why not. Assume detectors are properly calibrated and operated. (1.0)
- 2. Describe the principle of operation of the RCS Saturation Margin Monitor, including the inputs to the monitor. (1.0)
  - 3. Upon loss of both feedwater pumps, the ICS positions the control valves EF-V30A/B to maintain SG H<sub>2</sub>O level. What level is maintained and where is this indicated:
    - a. With reactor coolant pumps available. (0.5)
    - b. With reactor coolant pumps not available. (0.5)
  - 4. With regard to cold, safe shutdown, list ten (10) pertinent instruments which have been selected for placement on a separate panel outside the control room. (2.0)
  - At 90 minutes and again at 113 minutes into the TMI-2 event, operators observed anomalous increases on the intermediate range NIs.
    - a. Approximately what was the order of magnitude of the increases. (0.5)
      - b. Explain the cause of these increases. (1.0)

# E. SAFETY AND EMERGENCY SYSTEMS (8.0)

- a. Outline all of the Unit #1 Emergency Feedwater System modifications. (2.0)
  - b. List the signals which will automatically start the "A" motor driven EFW pump and the turbine driven EFW pump. (1.0)
- Explain the purpose of the PRZ Heater Emergency Power Supply System. (1.0)
  - What RPS trips are bypassed when in the Shutdown Bypass Mode. (1.0)
  - 4. Recently, Crystal River Unit #3 suffered the loss of the +24 volt power supply to the non-nuclear instrumentation, with the reactor at 100% power. List the cause of the loss of voltage and briefly describe the significant events that occurred due to the condition. (2.0)
  - List the following full power RPS trip setpoints, with four (4) RCS pumps in operation: (1.0)
    - a. Nuclear power (% of rated power)
    - b. High Reactor coolant pressure
    - c. Lo Reactor coolant pressure
    - d. RCS maximum temperature
    - e. High Reactor building pressure

### F. STANDARD AND EMERGENCY OPERATING PROCEDURES (10.0)

- With regard to a normal Reactor startup and approach to criticality, list: (2.5)
  - a. Maximum SUR
  - b. Minimum overlap between source and intermediate range indication.
  - c. Action required if criticality is schieved prior to rods reaching \_5] % AK/K below ECP. (Fill in the blank, also.)
  - d. Exceptions to the rule that CRA Safety groups be at upper limits whenever positive reactivity is being inserted.
  - e. Number of licensed operators in the control room.
- 2. Prior to TMI-1 modifications, during a transient which results in overcooling of the RCS, PRZ level decreases and the operators open MU-V16B and start a second makeup pump to restore PRZ level. With the installation of the HPI cross-connects, would such operator action be appropriate. Explain your answer. (1.0)
- During a TMI-1 startup, in-core quadrant tilt indicates +6%. What operator action, if any, is necessary for this condition. (1.0)
- 4. With the plant operating at full power, certain precautions and limitations apply. Provide the following information and operator action pertaining to these: (1.5)
  - a. The control room computer becomes inoperable
  - b. Maximum PRZ level
  - c. Jinimum boron concentration
  - d. Maximum core thermal power
  - e. A limiting condition for operation can not be met

#### F. STANDARD AND EMERGENCY OPERATING PROCEDURES (CONTINUED)

- 5. During full power operation, an explosion and fire occurs local to the control room of Unit #1, resulting in thick, acrid smoke filling the control room. Supervision determines that evacuation is necessary. Prior to evacuation, operators must perform certain duties. List those duties. (1.5)
- 6. a. List the symptoms which would alert the operators to the occurrence of an OTSG tube rupture. (1.5)
  - b. If HPI actuates on lo RCS pressure during the event, what immediate operator action is necessary. (0.5)
  - c. In an attempt to determine which OTSG has the rupture, the Chemistry Department is directed to sample both and analyze for what types of radioactive isotopes. (0.5)

## G. RADIATION CONTROL AND SAFETY (9.0)

- 1. It is necessary to you to work in an area where you may receive an amount of radiation which will cause you to slightly exceed your 10CFR Part 20 routine quarterly limits. Is this permitted, and if so, what conditions must be met for you to do this. (1.5)
- List four (4) different types of radiation and give typical situations in which each may be encountered at the TMI Station. (1.5)
- 3. What respiratory devices would provide adequate protection against: (1.0)
  - a. Radioactive gas
  - b. Radioactive particles
  - c. Tritium
- 4. A TMI plant chemtech accidently spills a freshly taken primary coolant sample on the floor.
  - a. Discuss what actions he should take. (1.5)
  - b. If a protable monitor reads 50 mrem/hour \( \gamma\) two feet from the spill, what is the contact level of radiation. (1.0)
- 5. With regard to "leaky" fuel elements, how could operators detect a leak which occurs in a TMI fuel element: (1.5)
  - a. In the core at full power
  - b. In spent fuel storage
  - c. Which is new fuel being received
- -6. Assume that an emergency unscheduled entrance into the reactor building is necessary. Describe what considerations (clothing, instruments, people, exposure limits) must be factored into the entry. (1.0)

### T. TMI-2 INCIDENT AND SMALL BREAK CONCEPT (9.0)

- List three objectives of the training program on the above subject which was administered to TMI and other operating B&W plant operators. (1.0)
- Explain why the availability of steam generator feedwater and RCS pump operation have little effect in the event of a large LOCA but may have a significant effect in a small break. (1.0)
- 3. During the TMI-2 event, the operators had no direct indication of saturation conditions. What indirect means of determining that the condition existed were available to them. (1.0)
- With all RCPs secured after a reactor trip, how do the TMI operators verify that natural circulation is occurring. (1.0)
- 5. Within the first eight minutes of the TMI-2 event the PRZ level indications went off-scale high. What was the cause of the increasing PRZ level. (0.5)
- List four (4) objectives of the emergency core cooling system after actuation and of operator action on a loss of coolant accident. (1.5)
- 7. What plant indications or conditions would alert you as an operator to whether a trnasient is an overcooling situation of the RCS or a small break. (1.0)
- 8. A number of operating procedures contain the statement "verify emergency feedwater flow". What indications do you as an operator have with which you can verify this flow. (1.0)

List the major mechanical failures and errors that created or aggravated the TMI-2 incident. List minimum of four (4). (1.0)

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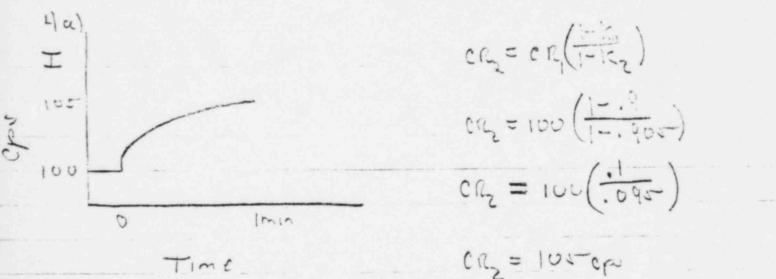
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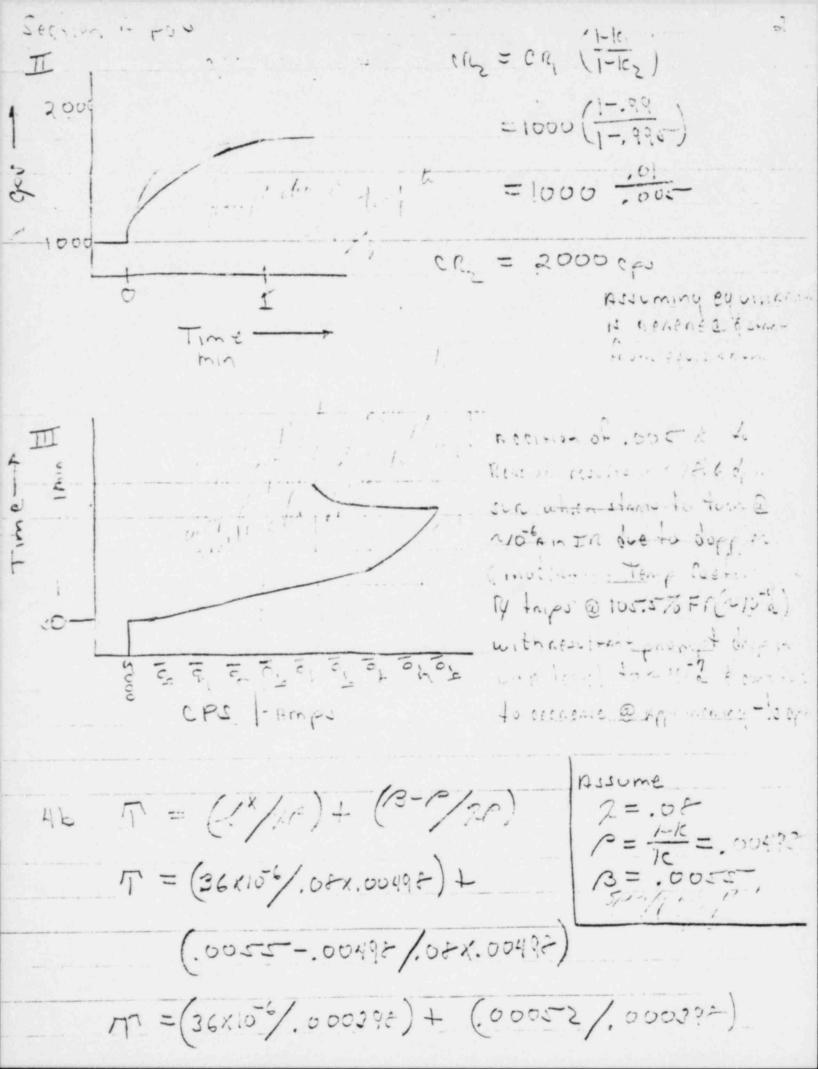
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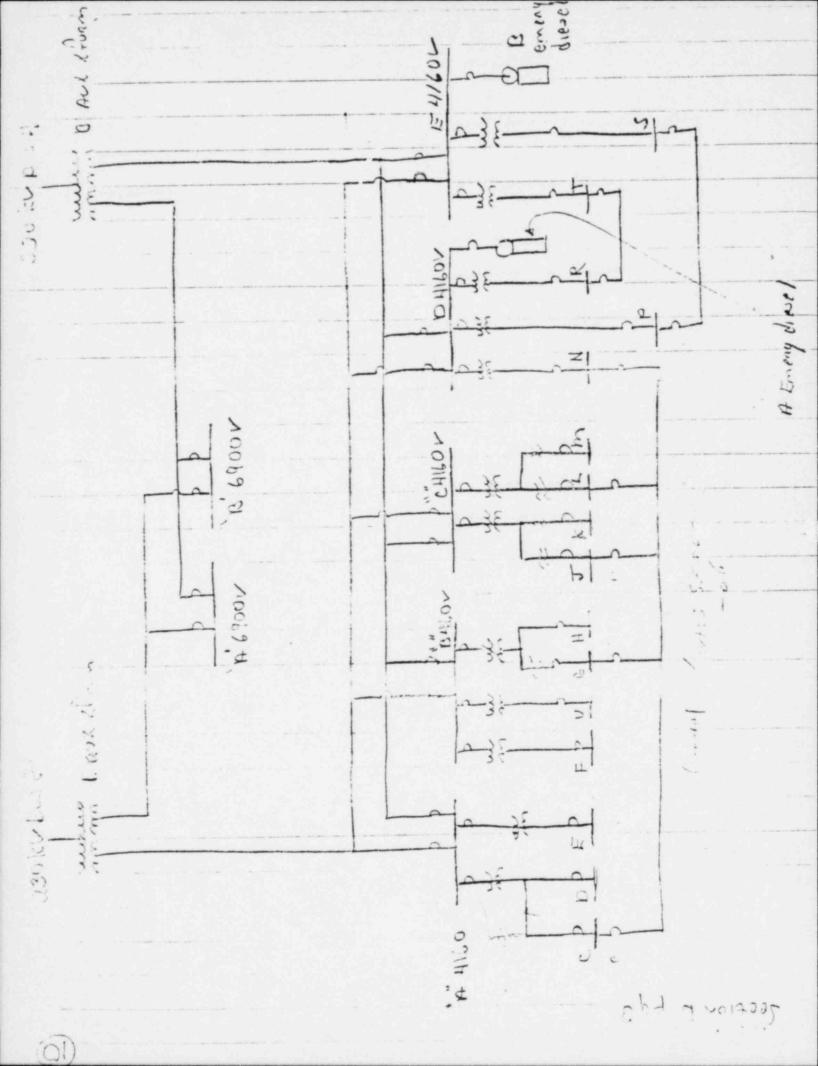
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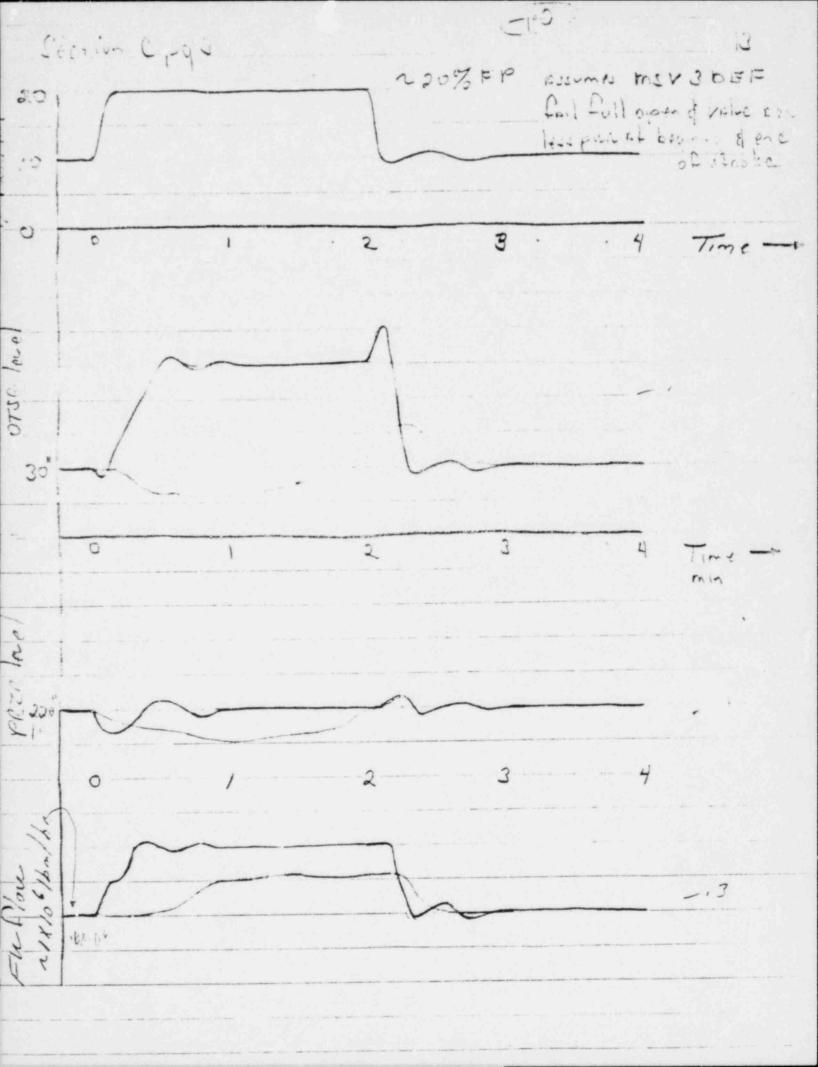
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  within 4 has in addition RPS serpes. I for \$1/20/1000

  must be reduced 2% for each 1% tilt, Roc inserted

  limits must be reduced 2% for each 1% first in a

  of limit the operational impolarse last remains

3 (cont) accorded by 27 for each 1/2 Tell in extre of his ha 4 9) 1 more hand to control each ahos, hand hear operate out ... . I Red lead onte each early by hand... c) 25 pm - If less contains the contains 6) 4535 invetormal-neduce pur to 52535 it com-est e) Commerce of the contract of the TS a) has the thirt They honored & tuko -5) 40, 1. P. F.C. 2+00 = EFF 2 6/0 tay Ft P 18/2 0,00 101-51 -Commenced energency con sin muv-3 leave is - 4 la jection in ALTO Go, 1 10 F-5 inchease alent plans inches officerations RCS pressure decreasing -Farn level opening. Sunday former free for b trip All RCP Freneta to 1202-60 feels coming auto KPI initiation to low ye netion C I'm long ived poor colore (persone 15 mm organ

Section or pul

1 de possece un live tonn de complete, tel mé nos.

c. c. c. c. c. e. < 5 (//-10) unen le la equel to mons.

c. c. c. c. c. e. < 5 (//-10) unen le la equel to mons.

superson nos-mose

a plane (a) honolog ren fuel Whither Fure

gamma (8) inside oning at pure (1.18)

B Scott on the park plus.

C Scott pur park plus.

So doe not construct a local emergency how he should stop tree was warner to expense them he should be constructed to expense the stop of the stop of

b Assuming the spill conditute a sount source de la la small corre then If DR, X Di = DR2 X DZ

Du=(Du x0; )/022

46.  $DR_{2} = \frac{1}{2} \left[ \frac{24'')^{2}}{(2')^{2}} \right] = \frac{2}{2}$   $DR_{2} = \frac{7.2 \text{ Rem/hr}}{2}$ 

Sou by I print some on compt Someon -. 2

O) By Alpin some on compt Someon -. 2

(a) ifteren openation to recognize importance ormain tening succosing 2) Tenen operation now for corporation of the services 5) Improve of motor response & honory of small limb loca

1.7

2) In + small freak continued operation of TICP strong from will cose on increase in the proport or man exiting the trees since if a discount is only will be exting In Pedertion Freductor rither normal a empire 12 REGISTER OF STATE OF THE PROPERTY OF THE in the generators for the rici to insure sub cooling is maintain and/or ne concerne uteem a france-14 in the LCS mod broke - mud orse hat rumara

3) The versus lies pressure

Para Temp rensul The RePump behavorion - I in Flow

occaseors comp

Interesting sie ops - due to voiding/s-term dance en interes

- The decreasion of the temperature are the state of the temperature are the temperature
  - The point level in energies since the top of the point was at less then Till porsione so the worker and house from the top to present to present the second to the top the second to the top to the top to the top the
- main tain clad temp <2200°F

  power t >176 /2 germation from Zine my course reserve

  Mainten cont in a coulder of property

  provider long a secretary bent remove & province is s/o

  prevent >1770 oxidation of classing

  prevent >1770 oxidation of classing

  power t >1770 oxidation of classing

  power t > 1770 oxidation of classing

  power t > 1770 oxidation of classing
  - 7) FW flow note IF MCP TOP arm

    Stepm pressure Lonsfort = Loca

    Stepm pressure Lonsfort = Loca

    IF DECRETGING, SUBCOCKED.

    Subcooling Many n