

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD  
AND THE SPECIAL MASTER

DOCKETED  
USNRC

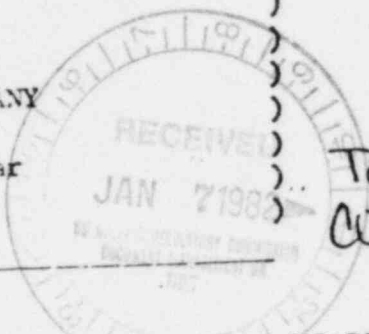
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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
Docket 50 - 289 Restart

In the Matter of  
METROPOLITAN EDISON COMPANY  
(Three Mile Island Nuclear  
Station, Unit 1)



*Townell/Hel Gray Swanson*  
*Colahin J. Goldberg Wagner*  
*Johnson / FF*  
*Reply Due 7-11-81*

AAMODI MOTION THAT THE HEARING BE REOPENED  
TO RECEIVE AND EXAMINE THE RESPONSES OF LICENSING CANDIDATES  
TO THE HPI QUESTION

The Aamodts motion that the hearing be reopened to receive and examine the responses of the licensing candidates to a question on the October, 1981 NRC licensing examination concerning the operators' actions prior to terminating the High Pressure Injection system at TMI-Unit 1. Since this knowledge on the part of the operators is essential to safe operation of the plant, the failure of eleven of the thirty-one candidates to make a correct response is significant.

The evidence of the incorrect responses was not supplied in time for the Special Master to examine any of the candidates in the reopened hearing on cheating. Since training and the content of the NRC examination were not issues in that proceeding, the examination of the candidates' responses may not have been appropriate. However, the issues raised by the incorrect responses are those that were to have been considered in the main hearing. This new evidence is clearly relevant to that proceeding and of sufficient weight for the hearing to be reopened.

Statistical analysis of the candidates' responses to the HPI question has suggested that there is evidence relevant to the reopened hearing on cheating as well. Of the seventeen candidates who took the A examination, eight failed whereas only three of the sixteen candidates who took the B examination failed.

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This great divergence in performance could be attributed to one of two causes: Either the two groups constitute two universes, or a form of cheating occurred. Since it is more reasonable to assume that the operators constitute a single training universe, the logical explanation is that a form of cheating affected the October licensing examination. In light of the testimony on December 10 of Mr. U, where Mr. U stated under oath that he, the morning of the April licensing examination discussed his examination freely in the control room with individuals who were about to take the B examination, the mechanism for cheating is apparent. It should further be noted that Mr. U testified that this kind of dialogue was commonplace, and he did not consider it to be cheating.

One can reasonably assume that had the above-mentioned control room dialogue (or other similar forms of information transferral) not occurred, lack of understanding of the HPI question would have been even more widespread.

Failure to have imparted necessary information concerning the HPI system to the candidates for licensing is attributable to the TMI Training Department. Either the training program was inadequate, or the operators had attitudes which precluded learning. In either case, the Training Department should have been aware that the candidates were not properly prepared. The responsibility of the Training Department in failing to properly prepare the candidates concerning the HPI question should be determined through a hearing.

The hearing should also define criteria that can adequately measure the proficiency of candidates for licensing. Of the eleven candidates who failed the HPI question, eight had received passing grades on the licensing examination and will be licensed by NRC. In areas of knowledge critical to the safe operation of the plant, 100% proficiency is not unreasonably stringent, particularly for senior reactor operators. (A single SRO may be present and in charge of the plant.) The refinement of criteria was the thrust of Aamodt Contention 2, and the Board's conclusion (PID 264 ) that the contention

is clearly defined by the absence of the operators' responses concerning the HPI system.

The new evidence also brings into question the Board's conclusions concerning training in general. (PID, August 27, 1981). In the course of the restart hearing, it was statistically demonstrated that the training program was inadequate. After an intensive training program (OARP), one-fourth of the operators failed some part of the final examination (Kelly) and one-half failed the Category T (TMI-2 events); after a year of requalification training, sixteen of 27 operators failed a mock of the NRC examination (ATTS). The NRC Staff and Board response was to close-off litigation in this area, asserting that adequacy of the training program would be determined by the results obtained on the NRC licensing examination. In view of the high failure rate on the October licensing examination, a conclusion of inadequate training by the TMI Training Department must result. A hearing to determine the cause of the inadequacy appears appropriate and necessary if the present Licensee is allowed to continue to operate the TMI-1 plant and train operators.

The Licensee has placed on the record of the reopened hearing a new version of their training program. This material was not subjected to cross-examination as training was not an issue of the reopened hearing. This material may very well be used by parties to the proceeding to address the adequacy of training through legal argument. Use of such unsupported documents could lead to a gross distortion in findings of fact and conclusions of law.

For all of the above reasons, the record of the hearing on the restart of TMI-1 should be opened to enter and examine the responses of the candidates for licensing to the questions on the October licensing examination, including and specifically examining the responses to the HPI question. The relevance to the data/<sup>on the HPI question</sup> to cheating, training, attitude and management should be considered. In order not to segment the Board's consideration of these important issues, the record of the hearing on cheating and the main hearing should be considered

a single record.

Respectfully submitted,

*Marjorie M. Aamodt*

Marjorie M. Aamodt

This is to certify that the above document, AAMODT MOTION THAT THE HEARING BE REOPENED TO RECEIVE AND EXAMINE THE RESPONSES OF LICENSING CANDIDATES TO THE HPI QUESTION, has been served on the enclosed service list by deposit in U. S. Mail, first class, this 21st day of December, 1981.

*Marjorie M. Aamodt*

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