

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE COMMISSION

DOCKETED  
USNRC

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

}  
Docket No. 50-289  
}

OFFICE OF SECRETARY  
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BRANCH

AAMODT COMMENTS TO THE COMMISSION MEETING  
OF DECEMBER 17, 1982

Since the Commission has extended the deadline for comments until January 7, we are able to respond.

The Licensee's quarrel is with Livermore Laboratories. Licensee claims that Livermore has inappropriately recommended seismic qualification of the TMI-1 Emergency Feedwater System due to Livermore's inaccurate understanding of the components of that equipment. Licensee believes that the EFS is capable of withstanding earthquakes.

I

Licensee's quarrel has a familiar and insidious ring.

- (1) Licensee claimed that the accelerated training program (OARP) did not teach the operators how the TMI-1 plant really operates. (Ross testimony, November 22, 1981)
- (2) The controversy concerning operators' answers to the October 1981 NRC examination relative to the HPI system was resolved by Licensee's explanation of the system. However, this explanation was not understood by many of the operators nor the NRC examiners even after lengthy conference with Licensee's supervisor of operations and instructors. (Board Orders, Parties' Motions, December 1981 following Reopened Hearing)
- (3) TMI's vice-president Hukill volunteered that there was no manual of material which accurately described the functioning of the TMI-1 plant from which the training department could instruct the licensed operators. (November 13, 1981)
- (4) The TMI training department supplied the NRC with inaccurate material on which the April and October examinations were based in part. (Ross, November 22, 1981 and HPI controversy)
- (5) On November 9, 1982 the Licensee incorrectly described the TMI -1 cooling mode in its comments before the Commission. (UCS Filing, December 16, 1982)

Licensee's argument presents at least two questions which the Commission needs to answer:

Is Licensee truthful in proposing that Livermore does not understand the TMI-1 equipment that they recommend be seismically qualified?

If Livermore has misinformation, to what extent is Licensee responsible and why?

We have little confidence in Licensee's own understanding of the TMI-1 plant or of Licensee's responsibility in transferring this knowledge to operation, maintainance, supervisory or NRC personnel.

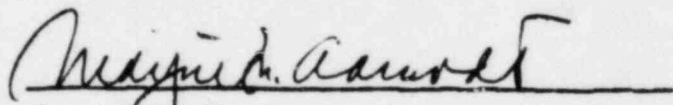
## II

Licensee agreed to seismically qualify the EFS on a long term basis, after restart at the first refueling, if feasible. The NRC Staff appeared to agree that this arrangement would be reasonable. We disagree that such a postponement would be in the interests of public health and safety.

The issue of whether the EFS is seismically qualified should be totally resolved if the TMI-1 plant is allowed to operate.

We would urge the Commission to find that all pertinent TMI-1 equipment and facilities be seismically qualified should reoperation of TMI-1 be decided. The NRC Staff Bulletin (December 17, 1982) stated that such qualification of Control Room equipment needed to monitor the course of an accident would only be required on a long-term basis with no deadlines set. (Page 13) We do not find such regulation to be in the interest of public health and safety.

Respectfully submitted,

  
Marjorie M. Aamodt

January 6, 1983