

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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USNRC

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

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THREE MILE ISLAND ALERT'S THIRD SUPPLEMENTAL
RESPONSE TO LICENSEE'S FIRST SET OF INTERROGATORIES

Interrogatories T-4 and T-5

Re subpart (3) of T-4 and T-5 of TMIA's Response to Licensee's
First Set of Interrogatories:

A series of memoranda indicate that individuals are assigned
as training instructors even though it is apparent from their
past performance that they are unqualified for those positions.
See generally the following documents:

- (1) Employee Performance Review for Mr. Olive, 10/19/83;
- (2) Memorandum from Hukill to File re: Discussions with
Olive, shift foreman, TMI-1, 6/8/84;
- (3) Memorandum to Hukill from Toole re: Olive, 6/14/84
- (4) Memorandum from M. Maag to Mr. Ross, 7/23/84

In support of subpart (5) of T-4 and T-5 of TMIA's Response
to Licensee's First Set of Interrogatories and Request for Pro-
duction:

Management is unable to respond to recommendations for re-
form from within its own ranks. In response to a request by
Mr. Arnold, D.A. Ross wrote in a memorandum to Mr. Arnold and

Mr. Clark, dated 8/3/82, that he believed that instructors must have not only command of the subject matter but also be able to present knowledge so that students can understand what is being taught. Mr. Arnold and Mr. Clark have not paid attention or responded to Mr. Ross' suggestions.

In support of subparts (7) and (9) of TMIA's Response to Licensee's First Set of Interrogatories and Request for Production, T-4 and T-5:

GPU has not instilled an attitude in its operators that cheating will not be tolerated and employees who participate in cheating will be appropriately disciplined. The following series of documents indicate that GPU had not appropriately disciplined Mr. Mayhue and did not instill in him any attitude that his participation in the cheating incidents was not to be tolerated:

- (1) Ross to Hukill Memorandum with attached evaluations of Job Performance, 3/25/83;
- (2) Ross and Toole Memorandum to Hukill, 5/12/83 re certification;
- (3) Hukill Memorandum to Files, 5/19/83;
- (4) Memorandum to Payroll, 6/14/83;
- (5) Mayhue to Hukill Memorandum, 8/3/83;
- (6) Hukill to Mayhue Memorandum, 8/3/83.

In support of subpart (6) of TMIA's Response to Licensee's First Set of Interrogatories T-4 and T-5:

See Offshift Tour by S.L. Newton, 1/25/82, which indicates that OJT training does not occur in that supervisors on the back-

shift did not perform checkouts of trainees; 2/12/82 Memorandum from W. Wegner (BETA) to R. Arnold and P. Clark re: Initial Impressions I, Item B, at 1, concerning recommendation for remedial reading courses and the need for GPU to accept the responsibility for problems with the training program; 3/3/82 Memorandum from Wegner to Clark re: Initial Impression II, at 1, regarding recommendations to resolve BETA Report problems.

GPU management targets those employees who bring to their attention problems in the training program for retaliatory treatment. See Hukill to Shovlin Memo, 3/16/83; Shovlin to Hukill Memorandum 3/17/83; Minutes of 3/17/83 meeting among Whitman, Newton, Shovlin, Natale and Hahn, concerning allegations an operator raised to Hukill during an off-shift tour. His concern was that a foreman directed him to proceed with work in contradiction to those procedures he had been instructed should apply.

In support of subparts (10) and (11) of TMIA's Response to Licensee's First Set of Interrogatories, T-4 and T-5:

Mr. Hukill failed to certify Mr. Frederick on August 23, 1984, only after the issuance of NUREG-0680, Supp. 5, raised questions about his prior conduct. Mr. Hukill appeared to have certified Mr. Frederick at a prior time, along with the approval of M. Ross and R. Toole. This indicates that management did not take seriously Mr. Frederick's earlier failures of the oral exam and poor performance until the NRC Staff in NUREG-0680, Supp. 5, specifically criticized Mr. Frederick. See 7/16/84 Final Certification Statement signed by M. Ross and R. Toole to certify Frederick and Final Certification which was refused by Hukill, dated 8/23/84,

with four-page explanatory statement by Hukill regarding his refusal to certify Frederick.

Interrogatory T-19

See Response to Interrogatory T-4, subpart (6) of TMIA's response to Licensee's First Set of Interrogatories T-4 and T-5.

Interrogatory T-24(c)

CPU should discipline and/or remove those employees identified by TMIA in its response to Interrogatories T-4 and T-5, subpart (c), Three Mile Island Alert's Supplemental Response to Licensee's First Set of Interrogatories.

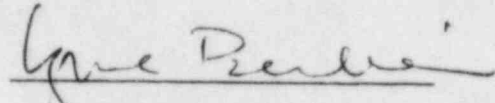
See also, 8/3/82 Mayhue to Hukill Memorandum in which Mayhue states that his acceptance of a two-week suspension does not constitute admission of his participation in the cheating incidents.

Interrogatories T-4 and T-5

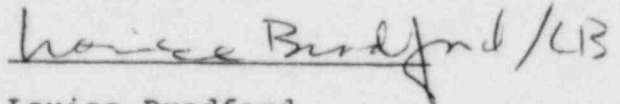
TMIA raises this additional concern regarding the licensee's training program:

GPU does not in fact ensure that the evaluations reached in the course of the training program are used to assign, discipline and/or remove individuals when these evaluations demonstrate they are not qualified to perform their jobs. See, e.g., Memoranda regarding Mr. Olive, identified in response to TMIA's response to subpart (5) of T-4 and T-5, subpart (c) in this Third Supplemental Response to Licensee's First Set of Interrogatories.

Respectfully submitted,



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