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RELATED CORRESPONDENCE

October 11, 1984

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

LICENSEE'S ANSWERS TO UNION OF CONCERNED
SCIENTISTS' SIXTH SET OF INTERROGATORIES
AND DOCUMENT REQUESTS TO GENERAL PUBLIC UTILITIES

Licensee General Public Utilities Nuclear Corporation (GPU Nuclear), pursuant to 10 C.F.R. § 2.740b, hereby submits the following answers to "Union of Concerned Scientists' Sixth Set of Interrogatories and Document Requests to General Public Utilities." Licensee's answers and objections were discussed by counsel for Licensee and counsel for the Union of Concerned Scientists ("UCS") yesterday. The provision of answers to these interrogatories is not to be deemed a representation that Licensee considers the information sought to be relevant to the issues to be heard in this remanded proceeding.

INTERROGATORIES

6-1. Has the Reconstituted OARP Committee or any members thereof undertaken any analyses, or investigations, gathered any further information or done any further work since the preparation of the Special Report to prepare for the remanded proceedings? If so,

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- a. Describe specifically the nature of the analyses, investigations, information gathering or other work.
- b. Identify the person(s) who performed the work.
- c. State when the work was performed.
- d. Provide all documentation of the work, including notes, memoranda, or any other documents.
- e. If further documents were reviewed, identify each and state the purpose for which it was reviewed.

6-2. Has the ROARP Committee or any members thereof, since the preparation of the Special Report, interviewed or contacted individuals beyond those listed in the Appendix to the Report? If so:

- a. Identify each person interviewed or contacted.
- b. State the purpose of the contact.
- c. State the topic and substance of the contact.
- d. State when the interview or contact took place.
- e. State who in the ROARP Committee conducted the interview or contact.
- f. Provide all documentation of the interview or contact, including the notes of all parties and any other documentation.

ANSWER & OBJECTION. On September 21, 1984, Licensee reached an agreement with UCS, reflected in Licensee counsel's September 26, 1984 letter to counsel for UCS, as to the information Licensee would provide to UCS concerning the preparatory work of Licensee's expert witnesses, the members of the Reconstituted OARP Committee. Consistent with the agreement reached, that information will be provided by October 15, 1984.

To the extent UCS now seeks more information about Licensee's expert witnesses, in a discovery request that was served one day after the September 26, 1984 agreement letter was received by UCS, Licensee objects. To the extent UCS Interrogatories 6-1 and 6-2 request additional information, that information is beyond the scope of permissible discovery of expert witnesses, see Fed. R. Civ. P. 26(b)(4), or constitutes non-disclosable trial preparation or attorney work product materials, see 10 C.F.R. § 2.740(b)(2). Like UCS, Licensee objects to the disclosure of such information. See UCS' Response to Licensee's Second Set of Interrogatories to UCS, September 28, 1984, response to Interrogatory U-44.

6-3. Provide all evaluations of Mr. Frederick since 1981, including but not limited to evaluations by Messrs. Long, Newton, Knief and Ross.

6-4. Provide all evaluations of Mr. Long since 1981.

6-5. Provide all evaluations of Mr. Newton since 1981.

6-6. Provide all evaluations of the current GPU licensed operator instructors since 1981.

OBJECTION. Licensee objects to Interrogatories 6-3, 6-4, 6-5 and 6-6. These interrogatories fall outside the scope of interest of UCS in the remanded proceeding on training. All of these interrogatories seek evaluations of training or management personnel (Mr. Frederick, Dr. Long, Mr. Newton, and licensed operator instructors) since 1981. It is TMIA and not UCS who is the lead intervenor on the issues of (i) GPU Nuclear's response to the problems in its training program, and (ii)

adequacy of personnel responsible for the management and implementation of the training program. Interrogatories 6-3, 6-4, 6-5 and 6-6 fall squarely within TMIA's training issues.

Furthermore, Interrogatories 6-3 through 6-6 are significantly redundant with previous TMIA interrogatories Licensee already has answered. See Licensee's Answers to Intervenor Three Mile Island Alert's Second Set of Interrogatories to General Public Utilities (Training), September 12, 1984, answers to Interrogatories 2-5, 2-6, 2-7, 2-9, 2-14 and 2-15.

6-7. Provide all evaluations of Mr. Olive since 1981, including but not limited to evaluations by Messrs. Long, Newton, Knief, Ross and Frederick.

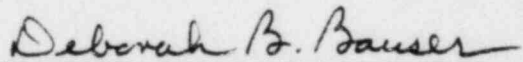
ANSWER & OBJECTION. Licensee already has provided, in response to UCS' (First Set) of Interrogatories, Interrogatory 3(e), special training evaluations of Mr. Olive since 1981. Also, of course, the requalification exams taken by Mr. Olive, which are training evaluations, already have been made available to UCS. In addition, Licensee has produced in the discovery reading room in response to UCS' (First Set) of Interrogatories, Interrogatory 3(d), the available oral examination records for Mr. Olive since 1981. Licensee also will make available in the discovery reading room the Employee Performance Review procedure and (blank) form used at GPU Nuclear. Using this form, Operations management has appraised Mr. Olive. To the extent UCS seeks the completed Performance Reviews of Mr. Olive, Licensee has provided its most recent completed annual evaluation of Mr. Olive in response to TMIA (second set)

document production request 26. Because of the highly confidential nature of Performance Reviews, and the absence of a showing by UCS of the need for other evaluations of Mr. Olive in order to pursue the issue of the adequacy of the TMI-1 licensed operator training program, Licensee objects to the disclosure of any other evaluations of Mr. Olive.

6-8. State specifically what Mr. Frederick's duties were during his assignment to the training program, when they began and when they terminated. State whether Mr. Frederick prepared and/or approved any examinations and, if so, identify.

ANSWER & OBJECTION. Licensee objects to the first part of Interrogatory 6-8 for the reasons stated in its objection to Interrogatories 6-3 through 6-6. In sum, the question is not within the scope of issues on which UCS is the lead intervenor; moreover, see Licensee's response to TMIA (second set) Interrogatory 2-16.

Respectfully submitted,



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Dated: October 11, 1984

October 11, 1984

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Answers to Union of Concerned Scientists' Sixth Set of Interrogatories and Document Requests to General Public Utilities" were served this 11th day of October, 1984, by deprecit in the U.S. mail, first class, postage prepaid, to the parties on the attached Service List.

Deborah B. Bauser
Deborah B. Bauser

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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) (Restart Remand on Management)
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Station, Unit No. 1))

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