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RELATED CORRESPONDENCE

STAFF
October 11, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'84 OCT 16 A11:01

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

Docket No. 50-289 *SP*
(Restart Remand
on Management)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

NRC STAFF'S INTERROGATORIES
AND DOCUMENT REQUEST TO TMIA

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, the NRC Staff hereby requests that TMIA answer the following interrogatories and produce for inspection and copying the documents requested herein. Pursuant to 10 C.F.R. § 2.740(e), these interrogatories and document requests are intended to be continuing in nature.

I. INTERROGATORIES

A. Instructions

1. Answer the following interrogatories separately (by parts) and fully in writing under oath or affirmation. If any interrogatory or part thereof or document request is objected to, state separately (by part) and fully the objection and the reasons therefore.

2. If any questions arise concerning the meaning or interpretation of any words or phrases contained herein, or concerning the substance of information sought or the manner of compliance, please contact Counsel for the NRC Staff immediately so that we may clarify the matter.

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B. Definitions

1. "NUREG-0760" means "Investigation into Information Flow During the Accident at Three Mile Island," January 1981 (Staff Ex. 5 in the TMI-1 restart proceeding).

2. "Document(s)" means every writing of every type and description, and every other instrument or device by which, through which or in which, information has been recorded and/or preserved, including but not limited to memoranda (including those reflecting meetings, discussions or conversations), notes, letters, drawings, files, graphs, charts, maps, photographs, deeds, agreements, contracts, handwritten notes, diaries, logs, ledgers, studies, data sheets, notebooks, books, appointment calendars, telephone bills, telephone messages, receipts, vouchers, minutes of meetings, pamphlets, computations, calculations, accountings, financial statements, voice recordings, computer printouts, computer discs and programs, and other data compilations, device or media on which or through which information of any type is transmitted, recorded or preserved. The term "document" also means every copy of a document when such copy is not an identical duplicate of the original.

C. Interrogatories

1(a). State the name, address and present employer of each person, other than the affiant for each answer to each interrogatory, who provided information upon which TMIA relied in answering each of the following interrogatories.

1(b). For each person identified in response to interrogatory 1(a), state separately all the information provided by that person for each interrogatory, including subparts.

2. For each interrogatory, separately identify all documents upon which TMIA relied in answering each interrogatory and subpart.

3(a). Does (i) TMIA or (ii) Mr. David H. Gamble (identified as a TMIA witness in the proceeding in TMIA's Response to Licensee's Third Set of Interrogatories and Third Request for Production (Dieckamp mailgram), (October 1, 1984), contend that NUREG-0760, insofar as it addresses the Dieckamp mailgram issue, is inadequate or deficient in any respect?

3(b). If the answer to Interrogatory No. 3(a) is yes, specifically state each inadequacy or deficiency which (i) TMIA or (ii) Mr. Gamble believes exists, identifying with page, paragraph and line numbers every such inadequacy or deficiency. For general inadequacies or deficiencies, provide specific examples.

3(c). For each inadequacy and deficiency identified in answer to Interrogatory No. 3(b), explain in detail the basis for TMIA's or Mr. Gamble's claim that an inadequacy or deficiency exists.

4. For each inadequacy and deficiency identified in answer to Interrogatory No. 3(b), identify the date on which (a) TMIA or (b) Mr. Gamble first identified the alleged inadequacy or deficiency.

5. For each inadequacy and deficiency identified in answer to Interrogatory No. 3(b), identify each past or present NRC employee to whom Mr. Gamble communicated the alleged inadequacy or deficiency and the date on which such communication was made to each such NRC employee.

6(a). For each inadequacy and deficiency identified in answer to Interrogatory No. 3(b), state precisely the manner in which (a) TMIA or (b) Mr. Gamble believes the inadequacy or deficiency should have been, or should, be corrected.

6(b). Identify each past or present NRC employee to whom Mr. Gamble communicated each proposed correction identified in answer to Interrogatory 6(a) and the date on which such information was provided to each such NRC employee.

7. For each inadequacy and deficiency identified in answer to Interrogatory No. 3(b), state (a) TMIA's and (b) Mr. Gamble's position on which statements, findings, recommendations, or conclusions contained in NUREG-0760 would or should be changed or otherwise affected by TMIA's and Mr. Gamble's proposed corrections to such inadequacies and deficiencies.

8. In TMIA's Response to Licensee's Third Set of Interrogatories and Third Request for Production (Dieckamp Mailgram), October 1, 1984, TMIA states: "Mr. Gamble will testify as to the areas which the NRC investigation and report failed to address."

8(a). Identify each such area.

8(b). State the basis for your belief that such areas should have been addressed.

8(c). State how you believe the statements, findings, recommendations and conclusions of NUREG-0760 would be affected if such areas were addressed.

9. Identify any additional criticisms (a) TMIA or (b) Mr. Gamble has of NUREG-0760 which were not identified in answer to Interrogatory Nos. 3-8. Explain in detail the basis for any such criticism.

10(a). Does (i) TMIA or (ii) Mr. Gamble contend that the NRC's investigation into the information flow issue (which culminated in NUREG-0760), insofar as it relates to the Dieckamp mailgram issue, was inadequate or deficient?

10(b). If the answer to Interrogatory 9(a) is yes, specifically state each inadequacy or deficiency which (i) TMIA or (ii) Mr. Gamble believes existed. For general inadequacies or deficiencies, provide specific examples.

10(c). Identify by name and date each NRC-conducted interview or deposition which TMIA or Mr. Gamble contend were inadequate or deficient.

10(d). For each inadequacy and deficiency identified in answer to Interrogatory Nos. 10(b) and (c), explain in detail the basis for TMIA's or Mr. Gamble's claim that an inadequacy or deficiency existed.

11. For each inadequacy and deficiency identified in answer to Interrogatory Nos. 10(b) and (c), identify the date on which (a) TMIA and (b) Mr. Gamble first identified the alleged inadequacy or deficiency.

12. For each inadequacy and deficiency identified in answer to Interrogatory Nos. 10(b) and (c), identify each past or present NRC employee to whom Mr. Gamble communicated the alleged inadequacy or deficiency and the date on which such communication was provided to each such NRC employee.

13(a) For each inadequacy and deficiency identified in answer to Interrogatory Nos. 10(b) and (c), state precisely the manner in which (a) TMIA or (b) Mr. Gamble believes the inadequacy or deficiency should have been corrected.

13(b). Identify each past or present NRC employee to whom Mr. Gamble communicated each proposed correction identified in answer to 13(a) and the date on which such information was provided to each such NRC employee.

14. For each inadequacy and deficiency identified in answer to Interrogatory Nos. 10(b) and (c), state the manner in which (a) TMIA or (b) Mr. Gamble contends the statements, findings, recommendations, and conclusions contained in NUREG-0760 was affected, and identify each such statement, finding, recommendation and conclusion.

15. Identify any additional criticisms (a) TMIA or (b) Mr. Gamble has of the NRC's investigation into information flow, insofar as it relates to the Dieckamp mailgram issue, which were not identified in answer to Interrogatory Nos. 9-13. Explain in detail the basis for any such criticism.

16. Identify each meeting, discussion, or other occasion prior to January 26, 1984 at which Mr. Gamble had the opportunity to comment on, criticize, or suggest changes to, NUREG-0760 or the investigation into information flow as they relate to the Diekamp mailgram issue.

17(a). Will TMIA offer Mr. Gamble as a fact witness or expert witness or both?

17(b). Summarize the testimony which Mr. Gamble will offer, including any conclusions or opinions which will be offered.

17(c). Identify each document which TMIA intends to offer into evidence in connection with Mr. Gamble's testimony.

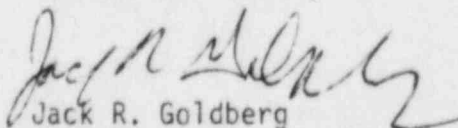
17(d). Identify each document on which Mr. Gamble will rely for his testimony.

17(e). State or identify Mr. Gamble's qualifications for the testimony he will offer.

II. DOCUMENT REQUEST

Produce for inspection and copying all documents identified in response to each interrogatory above.

For the NRC Staff,


Jack R. Goldberg
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 11th day of October, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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METROPOLITAN EDISON COMPANY, ET AL.)
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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S INTERROGATORIES AND DOCUMENT REQUEST TO TMIA" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, by deposit in the Nuclear Regulatory Commission's internal mail system, or, as indicated by double asterisks, by hand delivery, this 11th day of October, 1984:

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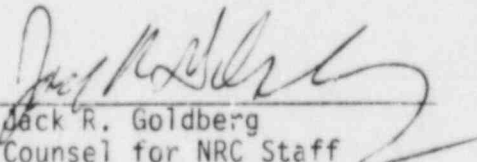
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