

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

DOCKETED

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

INTERVENOR THREE MILE ISLAND ALERT'S FIRST  
REQUEST FOR PRODUCTION TO GENERAL PUBLIC UTILITIES

TO: GENERAL PUBLIC UTILITIES NUCLEAR CORPORATION

Intervenor Three Mile Island Alert ("TMIA"), pursuant to 10 C.F.R. 2.741, hereby requests General Public Utilities Nuclear Corporation ("GPU") to produce and make available for inspection and/or copying, each document in the possession or custody of GPU or subject to the control of GPU or its agents and attorneys, as requested below, by or before August 16, 1984.

DEFINITIONS

(a) The Nuclear Regulatory Commission or "NRC" shall mean the Nuclear Regulatory Commission, its branches, departments, sections, offices, subdivisions, its present and former commissioners, administrators, management, employees, agents, representatives, consultants, officials or attorneys or their agents, attorneys or representatives.

(b) "General Public Utilities" or "GPU" shall mean General Public Utilities, any of its subsidiaries, including but not

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limited to GPU Nuclear Corporation and Metropolitan Edison Company, or its subsidiaries' branches, divisions, departments, sections, affiliates, offices, and present and former officers, directors, management, board of directors, employees, staff, officials, agents, consultants, attorneys, representatives or their attorneys, representatives and agents.

(c) "Babcox and Wilcox" or "B&W" shall mean the Babcock & Wilcox Company, its subsidiaries, branches, divisions, departments, sections, affiliates, officers, and it or its subsidiaries' present and former officers, directors, management, board of directors, employees, officials, staff, agents, consultants, attorneys, representatives or their attorneys, representatives and agents.

(d) The I&E Investigation and/or I&E Report shall mean NUREG-0760 and/or the investigation leading to NUREG-0760, entitled "Investigation into Information Flow During the Accident at Three Mile Island," dated January, 1981.

(e) The "Interior Committee Report" or "Udall Report" shall refer to the report prepared by the Majority Staff of the Committee on Interior and Insular Affairs of the U.S. House of Representatives, entitled "Reporting of Information Concerning the Accident at Three Mile Island," dated March, 1981.

(f) The Senate Report shall refer to the report on the Three Mile Island accident completed by the Subcommittee on Nuclear Regulation of the Senate Committee on Environment and Public Works, and the investigation leading up to that report.

(g) The SIG P port shall refer to the report and/or investigation of the NRC Special Inquiry Group headed by Mitchell Rogovin, entitled NRC "Special Inquiry Report," dated January, 1980.

(h) The Kemeny Report shall refer to report of the special commission appointed by President Carter to investigate the Three Mile accident entitled "The Report of the President's Commission on Three Mile Island."

(i) "Document" shall mean every writing of every type or description, and every other instrument or device by which, through which or on which information has been recorded and/or preserved, including but not limited to memoranda, notes, letters, drawings, files, graphs, charts, photographs, slide presentations, handwritten notes, logs, ledgers, studies, data sheets, appointment calendars, telephone messages, meeting minutes, calculations, computations, financial statements, voice recordings and other data compilations or every other device or medium on which or through which information of any type is transmitted, recorded or preserved.

(j) "Person" shall refer to any natural person, firm, partnership, joint venture, trust, corporation, holding company or other entity, natural or legal, domestic or foreign.

(k) "Communication" shall mean discussion, conversation, letter, memorandum, telephone call, message or direction, whether

written or oral or whether in person, by telephone or by mail.

INSTRUCTIONS FOR USE

A. All documents are to be made available for inspection and/or copying which are in your possession or under your control, or in the possession or under the control of your officers, management, executives, employees, staff, directors, officials, attorneys, consultants, accountants, or their agents, representatives or attorneys.

B. IF GPU contends that any document responsive to any request for production listed below is privileged in whole or in part, or otherwise objects to any part of any request, state the reason for each objection or grounds for exclusion, and identify each person having knowledge of the factual basis, if any, on which the privilege or other ground is asserted.

C. If any documents responsive to any request for production is no longer in existence, then answer the following questions:

(1) identify what information was maintained in that document;

(2) identify the type of document which contained such information;

(3) state the time period during which such document was maintained.

(4) state the circumstances under which such document ceased to exist;

(5) state the date when such document ceased to exist;

(6) identify all persons having knowledge of the circumstances under which such document ceased to exist; and

(7) identify all persons who have knowledge or had knowledge of the document and the contents thereof.

This Request for Production is deemed to be continuing such that GPU is requested to supplement production with all responsive documents which come into its possession, custody or control subsequent to production of documents pursuant to intervenor's request.

DOCUMENTS TO BE PRODUCED

All documents which constitute, relate to, mention or refer to in any way the following:

1. Communications made on March 28, March 29 or March 30, 1979 between GPU and the NRC; GPU and B&W; GPU and the Commonwealth of Pennsylvania; and B&W and the Commonwealth of Pennsylvania.

Include all transcripts, notes, or other records of conversations, discussions, communications or contacts occurring during this three-day period.

2. All reports, studies, investigations, inquiries or research conducted by GPU, B&W or any GPU or B&W consultant or contractor concerning the TMI-2 Accident or any event occurring

during the TMI-2 Accident, including but not limited to reports, drafts or interviews and instructions concerning those reports and studies on the following issues:

- (a) The pressure spike which occurred at approximately 1:50 p.m. on March 28, 1979;
- (b) The PORV had been open and/or leaking from approximately 4:00 a.m. to approximately 6:00 a.m.;
- (c) The HPI had been throttled during the time the PORV had been open and/or leaking during the early morning of March 28, 1979;
- (d) Hot leg temperatures in excess of 700 degrees F. had existed during the morning of March 28, 1979;
- (e) Temperatures in excess of the saturation temperature indicated the core was or had been in a condition to be cooled by steam rather than water;
- (f) The TMI-2 reactor was in a condition not covered by emergency procedures on March 28, 1979;
- (g) The in-core thermocouple temperature readings for any part of the day of March 28, 1979;
- (h) The neutron detectors mounted inside and outside the reactor pressure vessel indicated increased neutron levels on March 28, 1979;
- (i) The high radiation levels detected by the radiation monitor mounted at the top of the containment building during the morning of March 28, 1979;
- (j) The hydrogen explosion and/or combustion which occurred around 1:50 p.m. on March 28, 1979;

(k) The Dieckamp mailgram, including but not limited to any investigation, inquiry or study about whether or not Mr. Dieckamp made any material false statement in that mailgram;

3. The briefing of the Pennsylvania Lt. Governor on March 28, 1979 at about 2:30 p.m., including but not limited to any tape recording of that meeting; personal notes; memoranda memorializing or otherwise recording the meeting; and/or minutes of that meeting.

4. Any briefing of the Commonwealth of Pennsylvania officials about the TMI Accident and/or the conditions of TMI-2, including but not limited to Mr. Miller's conversation with Mr. Dornsife at about 9:00 a.m. on March 28, 1979.

5. Interviews of Mr. Dieckamp concerning the TMI-2 Accident, the events occurring at TMI-2 on March 28, March 29 or March 30, 1979; and/or any event or condition of the reactor occurring on March 28, March 29, or March 30, 1979.

6. Calendars, charts, graphs, records, telephone messages, personal notes or personal files of the following persons concerning the TMI-2 Accident; the events occurring at TMI-2 on March 28, March 29 or March 30; the conditions of TMI-2 on March 28, March 29 or March 30, 1979; or reporting of any of the above to the NRC or the Commonwealth of Pennsylvania:

- (a) Herman Dieckamp;
- (b) Robert Arnold;
- (c) John Herbein;

- (d) Jim Floyd;
- (e) Walter Creitz;
- (f) Robert "Bubba" Marshall;
- (g) Greg Hitz;
- (h) Dale Pilsitz;
- (i) Ken Bryan;
- (j) Mike Ross;
- (k) Bill Zewe;
- (l) Edward Frederick;
- (m) Craig Faust;
- (n) Brian Mehler;
- (o) Joseph Chawstyck;
- (p) George Kunder;
- (q) Gary Miler;
- (r) John Flint;
- (s) James Seelinger;
- (t) Leland Rogers;
- (u) Robert Long;
- (v) William Kuhns; and

any other operator or GPU or B&W personnel present at TMI-1 and TMI-2 at any time on March 28, March 29, or March 30, 1979, or participating in bringing the TMI-2 Accident under control during this three-day period.

7. Any checks made of plant conditions and/or the containment after observance of the pressure spike and/or the activation of the reactor building spray pumps at about 1:50 p.m.



on March 28, 1979, including but not limited to the checks of the plant conditions and containment reported by Mr. Rogers, Mr. Chwastyk and Mr. Mehler in interviews and reports to the NRC and to GPU.

8. The pressure spike which occurred at approximately 1:50 p.m. on March 28, 1979, or the actuation of the containment spray pumps caused by the pressure spike.

Also produce the following:

9. All operator logs for the dates of March 28 to March 30, 1979 which record any conditions of the reactor and/or events occurring during the three-day period.

10. All records of the pressure spike which occurred at approximately 1:50 p.m. on March 28, 1979, including but not limited to the two strip charts which recorded the pressure spike.

11. All documents identified in response to Interrogatory Nos. 2, 4, 5, 6, 7, 12, 13, 14, 16, 26, 32, 33, 35, 36, 42, 43, 51, 56, 57 and 58.

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DATED: July 31, 1984

Attorneys for Three Mile Island  
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