

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

INTERVENOR THREE MILE ISLAND ALERT'S FIRST SET
OF INTERROGATORIES TO GENERAL PUBLIC UTILITIES

TO: GENERAL PUBLIC UTILITIES NUCLEAR CORPORATION

Intervenor Three Mile Island Alert ("TMIA"), pursuant to 10 C.F.R. 2.740 b, hereby requests General Public Utilities Nuclear Corporation ("GPUN" or "licensee") to answer the following interrogatories by or before August 16, 1984, separately, fully, in writing and under oath.

These interrogatories are deemed to be continuing, and any additional information relating in any way to these interrogatories which GPUN acquires subsequent to the date of answering them, and up to and including the time of hearing, should be furnished to intervenor promptly after such information is acquired.

INSTRUCTIONS

A. All information is to be divulged which is in your possession or under your control, or is in the possession or under the control of your present or former managers, officers, directors, executives, employees, staff, attorneys, consultants, accountants, or their agents, representatives or attorneys.

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B. Where an individual interrogatory calls for an answer which involves more than one part, each part of the answer should be set out so that it is clear to which interrogatory it refers.

C. Where identification of a meeting, conversation, discussion or communication is required, the following shall be separately stated as to each such meeting, conversation, discussion or communication: the date; place, persons present or participating; the method of communication, whether oral or written; the identity of each participant; the substance of each person's participation; the substance or subject discussed or communicated; the purpose of the meeting or communication; the identity of any person who possesses information concerning such meeting, conversation, discussion or communication; the substance of any decision made at such meeting, discussion or conversation; any minutes, correspondence, notes, memoranda or other writing which resulted from or memorialized such meeting, discussion or conversation; and the location of any such correspondence, notes, memoranda or other writing.

D. Where identification of a document is required, state the following: its date; its exact title; the general subject matter of the document; the author and his/her affiliation, office or business, presently and at the time the document or correspondence was prepared; the last known address of the addressee and his/her name, title, affiliation, presently and at the time the document was prepared; the last known address of every person to whom a copy of the document was to be sent, other

than the addressee described above; the name and address of all persons who now have the original and/or copies; the identification and location of the files where the original and each copy is kept in the regular course of business and the custodian thereof; and whether the document will be made available for inspection and copying, and the site of such voluntary production.

E. If GPUN contends that the answer to any interrogatory is privileged, in whole or in part, or otherwise objects to any part of any interrogatory, state the reasons 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.

F. If an interrogatory could, at one time, have been answered by consulting documents which are no longer in existence, in answer to such interrogatory:

1. identify what information was maintained;
2. identify all documents which contained such information;
3. state the time period during which such documents were maintained;
4. state the circumstances under which documents ceased to exist;
5. state the date when such documents ceased to exist;

6. identify all persons having knowledge of the circumstances under which such documents ceased to exist; and

7. identify all persons who have knowledge or had knowledge of the documents and their contents.

G. As used herein and unless the context otherwise required, the terms:

(i) "NRC" shall mean the Nuclear Regulatory Commission, its branches, departments, sections, offices, subdivisions, its present and former commissioners, administrators, officials, inspectors, investigators, staff, consultants, contractors, attorneys, employees, agents, representatives and accountants, and their agents, attorneys and representatives.

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

(iii) "Babcox and Wilcox" or "B&W" shall mean the Babcock & Wilcox Company, its subsidiaries, branches, divisions, departments, sections, affiliates, officers, and its subsidiaries, present and former officers, directors, management, board of

directors, employees, officials, staff, agents, consultants, attorneys, representatives or their attorneys, representatives and agents.

(iv) 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.

(v) The Interior Committee 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.

(vi) 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.

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

(viii) 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."

(ix) "Document" shall mean every writing of every type and 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, 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, accounting(s), financial statements, voice recordings, computer printouts, computer discs and programs, and other data compilations, device or medium 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.

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

(xi) "Communication" shall mean communication, discussion, conversation, contact, letter, memorandum, telephone call, telegram, message or direction, whether written or oral, and whether in person, by telephone or by mail.

H. A number of interrogatories are directed to specific

individuals. Intervenor requests a response from only that individual as to all such questions which are so directed.

INTERROGATORIES

1. Regarding any document responsive to Intervenor TMIA's First Request for Production of Documents of whose existence GPU is aware, or which GPU knew existed in the past, and which is not now within GPU's custody or control, state the following:

- (a) the current location of the document;
- (b) the custodian of the document;
- (c) the title and substance of the document;
- (d) the document request to which the document is responsive; and
- (e) if the document no longer exists, the last known location of the document and the circumstances under which the document ceased to exist.

2. Describe all lines and methods of communication and/or reporting between the NRC and GPU which existed on March 28, 1979. State the following for each such line or method of communication and/or reporting identified above:

- (a) the method of communication, whether by telephone, in person, by teletype or by some other method;
- (b) each person participating in each such method of communication;
- (c) the precise time each such method of communication was established;

(d) the precise length of time such method of communication was maintained;

(e) each person, who although not participating, had the opportunity to overhear and/or learn of the information transmitted by means of such method of communication on March 28, 1979;

(f) all persons who learned at any other time of what occurred during the communications, and the time, date and/or reason for that person being informed of such communications;

(g) the person who initiated, suggested or recommended setting up each particular method of communication and/or reporting listed above;

(h) identify any documents which refer to, mention, memorialize or otherwise concern any such method of communication.

3. Identify all persons assigned to the emergency organization or command team and all persons who participated in the think tank meetings in the shift supervisor's office from March 28 through March 30, 1979 at the TMI-2 site. Describe each such person's duties and responsibilities during this three-day period.

For each person identified above, state the exact time he was in Unit 2, his access to or location in the Control Room, and all activities or tasks he performed during this three-day period.

4. Identify all lines or methods of communication and reporting between the NRC and B&W which existed on March 28.

Identify the following concerning all such lines of communication and/or reporting identified above:

(a) the method of communication, whether by telephone, in person, by teletype or by some other method;

(b) the persons participating in each such method of communication or reporting, and the substance of his/her participating;

(c) the persons who had access to or the opportunity to overhear any communications described above;

(d) the precise time each such method of communication was established and the length of time it was maintained;

(e) persons who learned at any later time of the communications described above, and the time, date, reason and method by which these persons were so informed;

(f) persons who initiated, suggested, or recommended initiation of each particular method of communication and/or reporting described above;

(g) all documents which refer to, mention, memorialize or otherwise concern any such method of communication and/or reporting described above.

5. Identify all lines or methods of communication and/or reporting between GPU and the State of Pennsylvania, or any state agency or office, on March 28, 1979. For each such line of method of communication and/or reporting listed above, identify the following:

(a) the method of communication, whether by telephone, in person, by teletype or by some other method;

(b) all persons participating in each such method of communication or reporting, and the substance of his/her participation;

(c) all persons who had access to or the opportunity to hear any communications described above;

(d) the precise time each such method of communication and/or reporting was established and the length of time each was maintained;

(e) all persons who learned at any later time of the communications described above, and the time, date, reason and method by which such persons were so informed of the communications;

(f) all persons who initiated, or suggested or recommended the initiation of, each particular method of communication and/or reporting described above; and

(g) all documents which refer to, mention, memorialize or otherwise concern any such method of communication and/or reporting described above.

6. Identify all lines or methods of communication between GPU and B&W for the period of March 28, 1979 through March 30, 1979. For each such line or method of communication listed above, identify the following:

(a) the method of communication, whether by telephone, in person, by teletype or by some other method;

(b) all persons participating in each such method of communication and/or reporting, and the substance of his/her participation;

(c) all persons who had access to or the opportunity to hear any communications described above;

(d) the precise time each such method of communication and/or reporting was established and the length of time each was maintained;

(e) all persons who learned at any later time of the communications described above, and the time, date, reason, and method by which such persons were so informed of the communications;

(f) all persons who initiated, or suggested or recommended the initiation of, each particular method of communication and/or reporting described above;

(g) all documents which refer to, mention, memorialize or otherwise concern any such method of communication and/or reporting described above.

7. Identify all lines or methods of communication between B&W and the State of Pennsylvania and its agencies, offices or officials for the period of March 28, 1979 through March 30, 1979, and answer the questions posed in subparts (a) through (g) above for each such method identified.

8. At what time and date did Mr. Miller give an order not to turn on the oil pumps and/or any other equipment in the reactor building so as not to cause a spark which might ignite hydrogen in the reactor. Please state the answer of each of the

following persons to this question:

- (a) Gary Miller;
- (b) Brian Mehler;
- (c) Joseph Chwatsyk;
- (d) Michael Ross;
- (e) Charles Mell;
- (f) Theodore Illjes.

9. Identify the precise day and time for the three-day period from March 28 through March 30, 1979 that any member of the Command Team and/or member of the emergency organization had any concern regarding the presence of hydrogen in the reactor and for each such incident, identify all persons who held such a concern. Identify any conversations, discussions, meetings or communications regarding such concerns and all indicators of the condition of the plant which led that person or persons to hold such a concern. Identify any action taken in response to such concerns.

10. Describe all incidents and/or experience of any GPU or B&W personnel at TMI concerning electrical malfunctions of equipment during the year preceding the accident.

11. Describe the length of time it would take for an ascension and descension of an electrical spark or signal due to an electrical malfunction.

12. Describe all alarms which were actuated by the pressure spike which occurred at approximately 1:50 p.m. on March 28, 1979.

Identify all documents which recorded, referred to, mentioned, or concerned such alarms.

13. Identify any photographs, drawings, charts or any other graphic representation of the pressure spike and/or the effects of the hydrogen explosion occurring at about 1:50 p.m. on March 28, 1979.

14. Identify all investigations, inquiries, or reports which were conducted by GPU, B&W, or any GPU or B&W consultant or contractor concerning the TMI accident or the events occurring on March 28 to March 30, 1979 concerning the TMI accident. For each such investigation, inquiry or report, state the following:

- (a) the person who commissioned, authorized or directed it;
- (b) the person who conducted the investigation or inquiry or who authored the report;
- (c) the date of any report;
- (d) the title of any report;
- (e) the current location and/or custodian of the report, investigation, inquiry or investigative findings.

Describe the manner or method by which the investigation or inquiry was conducted or the report written, and any persons, documents, or data consulted during the investigation, inquiry or writing of each such report.

15. Identify all communications, discussions, conversations or briefings between GPU and B&W on one hand, and any member of

the Committee on the Interior and Insular Affairs or the Subcommittee on Energy and the Environment or the staff of the Committee, on the other hand, occurring on May 7, 1979, during the Committee/Subcommittee's tour of the TMI-2 facility, including but not limited to identification of all communications between Jim Floyd and members and staff of the Interior Committee or Energy and Environment Subcommittee.

16. Identify all communications from or to Herman Dieckamp from March 28, 1979 through May 30, 1979, concerning the TMI accident, or any conditions of the reactor or events occurring during the accident.

For all such communications identified, in addition to providing the information required according to Instruction C above, state the following:

- (a) the exact date and time of the communication;
- (b) the person who initiated the communication;
- (c) the purpose of the communication;
- (d) any action Mr. Dieckamp took as a result of the communication, including but not limited to any action he took to report the information he learned to any other GPU official, the NRC or the Commonwealth of Pennsylvania.

In particular, identify any information either to or from Mr. Dieckamp concerning the following:

- (a) The pressure spike which occurred at approximately 1:50 p.m.;

(b) The PORV had been open from approximately 4:00 a.m. to approximately 6:00 a.m.;

(c) The HPI (high pressure injection) had been throttled during the time the PORV had been 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) On March 28, 1979, the TMI-2 reactor was in a condition not covered by emergency procedures;

(g) Certain GPU and/or B&W personnel on site on March 28, 1979, were uncertain prior to noon on March 28, 1979, as to whether the TMI-2 core was being adequately cooled;

(h) The in-core thermocouple temperature readings for any part of the day of March 28, 1979;

(i) The neutron detectors mounted inside and outside the reactor pressure vessel indicated increased neutron levels on March 28, 1979;

(j) The high radiation levels detected by the radiation monitor mounted at the top of the containment building during the morning of March 28, 1979;

(k) The hydrogen explosion and/or combustion which occurred during the early afternoon on March 28, 1979;

(l) The actuation of the containment sprays associated with the pressure spike;

(m) Any instructions by Mr. Miller or other GPU personnel not to activate any equipment in the reactor building because it might cause a spark and/or a hydrogen explosion;

For any such information flowing to or from Mr. Dieckamp described above, please identify the following for such information:

(a) The person who supplied the information to Mr. Dieckamp or obtained the information from Mr. Dieckamp;

(b) The method by which this information was transferred;

(c) Whether the information was transferred in a person-to-person conversation and/or discussion in written form, over the telephone or telex, or by some other means;

(d) The exact time, date and place(s) at which the information was transferred;

(e) The reason or purpose for the communication;

(f) The person who initiated any such communication;

(g) Any document referring to, mentioning, documenting or memorializing any such communication;

(h) The current location or custodian of any such document identified in subpart (g) above;

(i) If any such document identified in (g) above no longer exists, the circumstances under which it ceased to exist and/or was destroyed;

(j) The person or persons to whom the information was transferred subsequent to the time Mr. Dieckamp communicated

the information, and the date, time, and place of any such subsequent transfer of information.

17. Identify all persons who knew at or around 8:00 a.m. on March 28, 1979, that the PORV had been open from about 4:00 a.m. to about 6:20 a.m., including a statement about the status of the knowledge of the following persons:

- (a) Ken Bryan;
- (b) Mike Ross;
- (c) Bill Zewe;
- (d) Brian Mehler;
- (e) George Kunder;
- (f) Gary Miller;
- (g) Jim Floyd;
- (h) Robert Arnold;
- (i) Herman Dieckamp;
- (j) J. G. Herbein.

If any of the above-listed persons had any such knowledge, identify all persons to whom they communicated such knowledge, and the time, date, location and purpose of each such communication.

18. Identify all persons who had knowledge or information around 8:00 a.m. on March 28, 1979, that the HPI had been throttled during the time the PORV had been leaking. Include in your answer the following persons: Ken Bryan; Mike Ross; Bill Zewe; Brian Mehler; George Kunder; Gary Miller; Herman Dieckamp; J. G. Herbein; Robert Arnold; Jim Floyd; Edward Frederick; and Craig Faust;

For any person identified above, identify all persons to whom he subsequently communicated such information and the time, date, purpose and location of any such communication.

19. Identify all persons who had knowledge of information around 8:00 a.m. on March 28, 1979 that hot leg temperatures in excess of 700 degrees had existed on that day. Include in your response the answers of the following persons to this question: Mike Ross, Bill Zewe, Brian Mehler, George Kunder, Gary Miller, John Flint, James Seelinger, Jim Floyd, Robert Arnold; J. G. Herbein; Craig Faust; and Edward Frederick.

For any person identified above, identify all persons to whom he subsequently communicated such information, and the time, date, purpose and location of any such communications. Answer the same question with respect to the same persons and their knowledge or information of hot leg temperatures at 9:00 a.m.; noon; and 2:00 p.m. on March 28, 1979.

20. Identify all persons who had knowledge or information on March 28, 1979 that temperatures in excess of the saturation temperature indicated that the core was or had been in a condition where it had been cooled by steam rather than water. Include in your response the answers of the following persons: Ken Bryan, Mike Ross, Bill Zewe, Brian Mehler, George Kunder, Gary Miller, John Flint, James Seelinger, Jim Floyd, Robert Arnold; J. G. Herbein; Edward Frederick; Craig Faust; Joseph Chwastyk; and Robert Long.

For any person identified above, identify all persons to whom he subsequently communicated such information, and the

time, date, purpose and location of any such communication.

Further, for each person identified above, state whether he knew or had knowledge on March 28, 1979 that temperatures in excess of 700 degrees F. were temperatures in excess of the saturation temperatures.

21. Identify all persons who believed, had information or had uncertainty prior to noon on March 28, 1979 as to whether the TMI-2 core was being adequately cooled. Include in your response the answers for the following persons: Ken Bryan, Mike Ross, Bill Zewe, Brian Mehler, George Kunder, Gary Miller, John Flint, James Seelinger, Jim Floyd, Robert Arnold, Edward Frederick, Craig Faust, Joseph Chwastyk, and Robert Long.

For any person identified above, identify all other persons to whom he subsequently communicated such information, belief or uncertainty, and the time, date, purpose and location of any such communication.

22. Identify all persons who had knowledge or information on March 28, 1979 that the TMI-2 reactor was in a condition not covered by emergency procedures, and for each such person state the time, or times during which he first held or was informed of such information and/or belief. Include in your response the answers of the following persons: Ken Bryan, Mike Ross, Bill Zewe, Brian Mehler, George Kunder, Gary Miller, John Flint, James Seelinger, Jim Floyd, Robert Arnold, Edward Frederick, Craig Faust, Joseph Chwastyk, and Robert Long.

23. Identify all persons with information or knowledge on

March 28, 1979 of the pressure spike which occurred at approximately 1:50 p.m., and for each such person identified above, identify the time or times at which he learned or was informed of the pressure spike.

For any person identified above, identify all persons to whom he subsequently communicated such information, and the time, date, purpose and means of any such communication.

24. Identify all persons with information or knowledge on March 28, 1979 that a hydrogen explosion and/or combustion had occurred during the afternoon on March 28, 1979, and identify the time or times at which he learned or was informed of the explosion and/or combustion. For any persons identified above, identify all persons to whom he subsequently communicated such information, and the time, date, purpose and means of any such communication.

25. Identify all persons with information or knowledge on March 28, 1979 of the actuation of the containment sprays at approximately 1:50 p.m. on March 28, 1979, and for each such person identified above, identify all other persons to whom he subsequently communicated such information and/or knowledge.

26. Identify all persons with information and/or knowledge on March 28, March 29, or March 30, 1979 of any instruction by Mr. Miller or any other GPU personnel not to activate equipment in the reactor building because it might cause a spark and/or a hydrogen explosion. For any such person identified above, in

addition, identify the following with respect to his information and/or knowledge:

(a) Any other persons with similar information, and the means by which he/she acquired that information;

(b) The means by which that person learned or was informed of the instructions;

(c) The person who gave such instructions and the reason(s) for giving such instructions;

(d) All persons who responded to or acted upon such instructions, and the specific actions he/she took in response to such instructions;

(e) Any documents which refer to, mention, memorialize or otherwise concern such instructions.

27. At what time(s) on March 28, 1979 did Command Team or Emergency Team personnel decide to employ and begin to implement a repressurization strategy? At what time on that date did the Command Team or Emergency Team personnel cease the depressurization strategy?

If either answer given above is other than the closing of the block valve at 3:08 p.m., explain the discrepancy between your answer and Mr. Chwastyk's testimony that a change was made from a depressurization to a repressurization strategy at the time of closing the block valve.

28. Identify all persons who instructed Emergency Team personnel to cease the depressurization strategy and begin a

repressurization strategy, the precise time such directions were given to all persons identified above, and the persons to whom such directions were given.

29. What were the reason or reasons for changing strategy to bring the reactor under control. Include in your answer, any indicators of the reactor's condition which led Emergency Team personnel to change the strategy.

30. If Mr. Miller is not identified above as the person who gave the order to change to a repressurization strategy, explain how emergency Team personnel acted without his direction.

31. What role, if any, did Robert Arnold play in changing from a depressurization to a repressurization strategy?

32. Identify all persons who heard a "thud," "thump" or other noise indicating that hydrogen or some other explosion or anomaly had occurred around 1:50 p.m. on March 28, 1979. For each person identified above, state the following:

(a) His belief at that time of the cause or reason for the noise;

(b) Any communication he had with any other person about the noise at any time on March 28, March 29 or March 30, 1979; the substance of those communications, and the exact time of the communications;

(c) The first time he believed the noise was caused by a hydrogen explosion or hydrogen combustion, whether or not he so understood it at 1:50 p.m. on March 28, 1979;

(d) Any action he or anyone else took after hearing the noise in response to the noise. Include an identification of the person taking such action, and the exact time of any such action;

(e) Any document recording, memorializing, referring to, mentioning, or concerning in any way the noise.

33. Identify all persons who became aware at any time of any alarm actuated by the pressure spike and/or hydrogen explosion occurring around 1:50 p.m. on March 28, 1979.

For each such person identified above, state the following:

(a) His belief at the time he became aware of the alarm or the cause or reason for the alarm;

(b) Any communications of this person with any other person concerning the alarm and the time, date and substance of those communications, and the persons with whom he communicated;

(c) Any action he or any other person took after becoming aware of the alarm;

(d) Any document recording, memorializing, mentioning, referring to, or concerning in any way any such alarm.

34. Identify and state in as precise words as possible, the substance of the conversation and/or discussions between or among Mr. Miller, Mr. Dieckamp and Mr. Herbein on March 28, 1979, including but limited to the conversations which occurred between them from approximately 2:00 p.m. when Mr. Miller left the site to meet with the Pennsylvania Lt. Governor and approximately 5:30

p.m., when Mr. Miller returned to the site.

35. Identify all investigations, inquiries or probes GPU or the NRC has made to determine why the operators' logs describe the pressure pulse which occurred at approximately 1:50 p.m. on March 28, 1979 as 4 psi and 5 psi when the magnitude of the pulse was in fact 28 psi.

Explain the reason or reasons the operators' logs erroneously recorded the magnitude of the pressure spike.

36. At what time or times on March 28 through March 30, 1979 did the hydrogen recombiner become actuated? For each time identified above, identify the following:

- (a) The manner in which the actuation was recorded;
- (b) The documents which record, memorialize, mention or otherwise concern the actuation, and their current location;
- (c) All persons who had knowledge or were informed of the actuation of the hydrogen recombiner at or near the time of actuation;
- (d) The persons to whom each person identified in subpart (c) above communicated the fact of the actuation of the hydrogen recombiner;
- (e) The mode of actuating the hydrogen recombiner, including whether it was actuated automatically or manually.

37. Explain the location of the in-core thermocouple data recorded with a digital voltmeter for the period from March 28 through May 7, 1979.

38. Explain the meaning of Mr. Miller's recorded comments to Mr. Troffer at Met-Ed at approximately 9:30 a.m. on March 28 which are recorded in a transcript of that date: "...to be honest with you, we've been assessing the plant.... We don't know where the hell the plant was going. The situation we're in is a delicate one because we actually have plant integrity.... If we had a leak we'd be all right."

39. Explain the meaning of Mr. Miller's additional recorded comments to Mr. Troffer as recorded in a transcript of March 28, 1979: "...in addition to this, the plant obviously experienced a pressure and temperature change fairly fast. I didn't say this to them--I'm just saying it to the group." What details did he not communicate to the Commonwealth of Pennsylvania authorities with whom he communicated earlier that morning?

What were the reason(s) for Miller not telling and/or withholding these details from the Commonwealth of Pennsylvania authorities? Did he at or about 9:30 a.m. communicate the details identified above to the NRC? If so, to whom did he communicate the information and at what time or times?

40. Did GPU inform the NRC of the following on March 28, 1979, and if so, who communicated the information; to whom at the NRC did he communicate the information; and at what precise hour did he communicate the information?

(a) It appeared the PORV had been opened and/or leaking from approximately 4:00 a.m. to about 6:20 a.m.;

(b) The HPI had been throttled during the time the PORV had been open and/or leaking;

(c) Temperatures in excess of 700 degrees F. had been measured in the hot legs;

(d) Temperatures in excess of 700 degrees F. had been measured on the in-core thermocouples;

(e) Temperatures in excess of 2000 degrees F. had been measured on the in-core thermocouples;

(f) The plant was in a condition not provided for in emergency procedures;

(g) Some GPU personnel were uncertain as to whether the core was in a condition where it was being adequately cooled on March 28, 1979;

(h) Radioactivity measurements on a reactor coolant sample indicated failure of a substantial portion of the fuel rods;

(i) A pressure pulse had been recorded on reactor building pressure measuring instrumentation.

If GPU did not inform the NRC on March 28 of any of the matters stated in subparts (a) through (i) above, state the date, time, and means by which that information was communicated to the NRC at any later time; the person who communicated such information; and the reason(s) for communicating such information to the NRC at that time.

If GPU did not communicate any matters stated in subparts (a) through (i) above to the NRC at any time, explain why not.

41. Answer the question posed in Interrogatory No. 40 above, including all subparts therein with respect to the Commonwealth of Pennsylvania instead of the NRC.

42. Describe all checks which were made of plant conditions and/or containment immediately after the occurrence of the pressure spike and/or the activation of the reactor building spray pumps. For each such check described above, state the following:

- (a) The person or persons who made such check;
- (b) Any document referring to, recording, memorializing or otherwise concerning any such check;
- (c) Any action taken as a result of or in response to any such check;
- (d) All persons who were informed on March 28, 1979 of the results of such checks and any action he took as a result of or in response to that information.

43. Answer the following with respect to Leland Rogers' Memorandum or Statement of 3/28/79 Unit II Transient, dated June 12, 1979, at page 22:

- (a) Describe all checks made of plant conditions and/or the containment in response to the pressure spike and/or activation of the reactor building spray pumps;
- (b) Identify all persons who made any such checks and all persons to whom the results of such checks were communicated;
- (c) Identify all documents which recorded, memorialized, mentioned, referred to or otherwise concerned such checks, and their current location;

(d) Identify the operator cited in the sixth sentence of the second paragraph on page 22;

(e) Identify all members of the monitoring teams mentioned in the seventh sentence of the second paragraph on page 22;

(f) Explain the basis for the conclusion noted in the fifth sentence of the second paragraph on page 22 that, "The transient conditions were a result of a rapid reaction between the H₂ and O₂ in the containment and occurred coincident with a continued long period of system venting to the containment."

44. State GPU's position as to whether any misstatements, inaccurate statements or false statements were made in the Dieckamp mailgram to Congressman Morris Udall. Identify all such misstatements, inaccurate statements and/or false statements.

45. State the time at which GPU first learned of such misstatements, inaccurate statements or false statements identified in response to Interrogatory No. 44 above. Identify all persons who learned of such misstatements, false statements or inaccurate statements, and identify all persons to whom they communicated such information; the date, time and reasons for which they communicated such information; and the action which GPU took in response to such information.

46. Identify any discussions, conversations, communications or contacts concerning the false statements, inaccurate statements or misstatements identified in response to Interrogatory No. 44 above.

47. Identify any action taken by GPU, including but not limited to any actions taken by Mr. Dieckamp after learning of the false statements, inaccurate statements or misstatements identified above, including but not limited to any action taken by GPU to correct the false statements, inaccurate statements or misstatements.

State the reason for failing to take any such action if your answer is that no action was taken by GPU to correct the false statements, inaccurate statements or misstatements identified above.

48. When did GPU first become aware of the substance of the interviews conducted by the NRC in preparation of the I&E Report? When did GPU first become aware of and/or review the I&E interviews of Brian Mehler and Joseph Chwastyk? Identify all persons to whom the substance of such interviews was communicated at any time prior to January, 1981.

When did Mr. Dieckamp first become aware of the substance of the interviews of Brian Mehler and Joseph Chwastyk.

Identify all persons who informed Mr. Dieckamp of the substance of these interviews and identify all communications between such persons and Mr. Dieckamp concerning the two interviews.

49. Identify all persons within GPU who held any responsibility to keep informed about and track the interviews conducted by the NRC concerning the TMI-2 accident.

50. Identify all persons within GPU who held any responsibility to stay informed about or track interviews conducted in the course of preparation of the Rogovin Report.

51. Identify all GPU personnel and/or attorneys who attended any part of any I&E interviews and/or Rogovin Report interviews.

For all persons identified above, identify all notes, memoranda, minutes or other documents they maintained concerning such interviews and all persons to whom such notes, memoranda, minutes or other documents were distributed.

52. For what purpose did Mr. Dieckamp send a mailgram to Congressman Udall on May 9, 1979. Identify all persons whom Mr. Dieckamp consulted prior to sending the telegram, and the substance of any communications with such persons. Identify all communications between Mr. Dieckamp and Mr. Floyd concerning the subjects discussed in the mailgram.

53. What is the basis for Mr. Dieckamp's statement in the mailgram that Mr. Floyd's statement that certain activity was in view of the NRC inspectors in the control room at the time of the accident referred to activation of the containment building spray and not to the pressure spike?

54. What was the basis for Mr. Dieckamp's statement in the mailgram that, "There is no evidence that anyone interpreted the 'pressure spike' and the spray initiation in terms of reactor core damage at the time of the spike nor that anyone withheld any information."

Describe the information to which Mr. Dieckamp was referring in the latter portion of this statement.

55. What was the basis for Mr. Dieckamp's statement in the fifth paragraph of the mailgram which suggests that the evening of Thursday, March 29, was the first time GPU learned of the pressure spike and postulated it to be the results of a hydrogen oxygen explosion within the containment building?

56. What was the basis for Mr. Dieckamp's statement in the fifth paragraph of the mailgram which suggests that the first time GPU took measurements intended to determine the extent of a hydrogen bubble within the primary reactor cooling loop was some time after the technical staff first reviewed the spike on the evening of Thursday, March 29.

Describe the measurements to which Mr. Dieckamp referred in the fourth sentence of the fifth paragraph of the mailgram, and identify all documents which record, memorialize, mention, refer to, or otherwise concern such measurements.

57. Identify all investigations, inquiries, studies or reports authored by GPU or any consultant hired by GPU regarding the Dieckamp mailgram to Congressman Udall and/or whether Mr. Dieckamp made any material false statement in that mailgram.

For all such investigations, inquiries, studies or reports identified above, identify the following:

(a) The person(s) who conducted, wrote, or participated in the investigation, investigative report, inquiry, study; or report;

(b) The purpose for the investigation, inquiry, study, or report;

(c) Any documents, including any reports or studies which resulted from the investigation, inquiry or study;

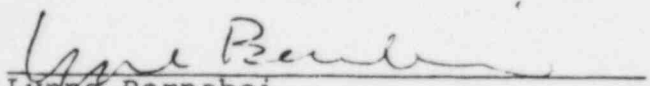
(d) The current location of any documents identified in subpart (c) above; and

(e) Any disclosure made of such investigations, inquiries, studies or reports to the NRC, and the date of any such disclosure.

58. Identify all information and/or knowledge Mr. Dieckamp held on May 8, 1979 and May 9, 1979 regarding the interviews and investigation being conducted by GPU concerning the TMI-Accident; events which occurred on March 28, March 29 and March 30, 1979; the conditions of the TMI-2 reactor on March 28, March 29 and March 30, 1979; and reporting of any such events or conditions to the NRC and/or the Commonwealth of Pennsylvania.

Identify all documents which mention, refer to, record, memorialize or otherwise concern any information and/or knowledge identified above.

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DATED: July 21, 1984

Attorneys for Three Mile Island
Alert

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

I hereby certify that I have served this 31st day of July, 1984 a copy of the foregoing Intervenor Three Mile Island Alert's First Set of Interrogatories to General Public Utilities and First Request for Product to General Public Utilities on the following by mail, first-class, postage prepaid:

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Washington, D.C. 20555

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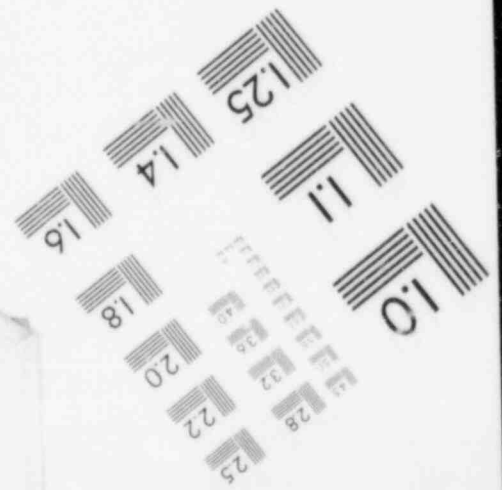
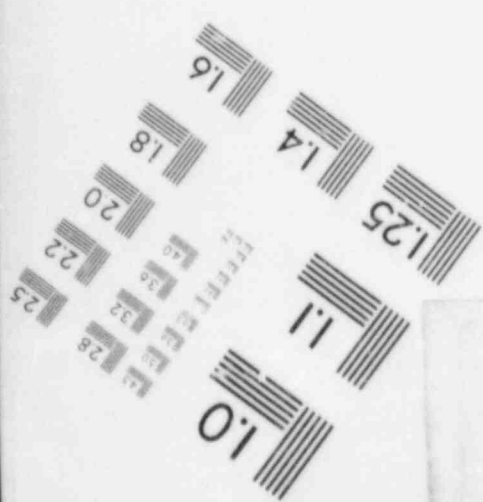
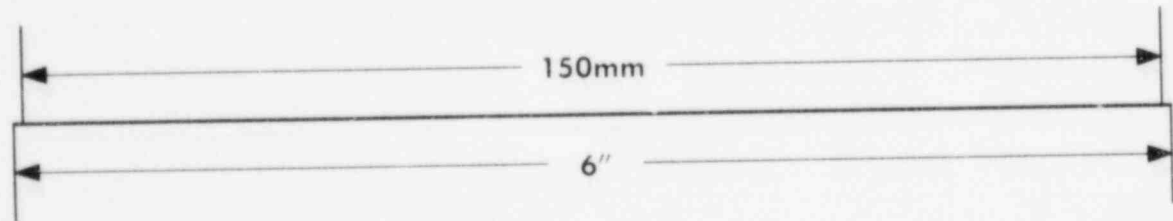
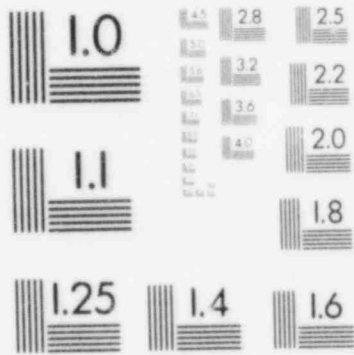
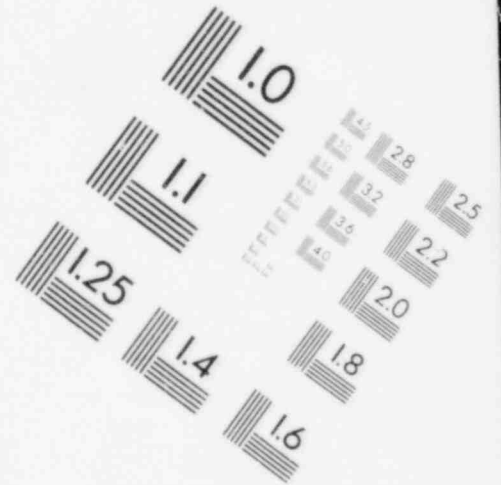
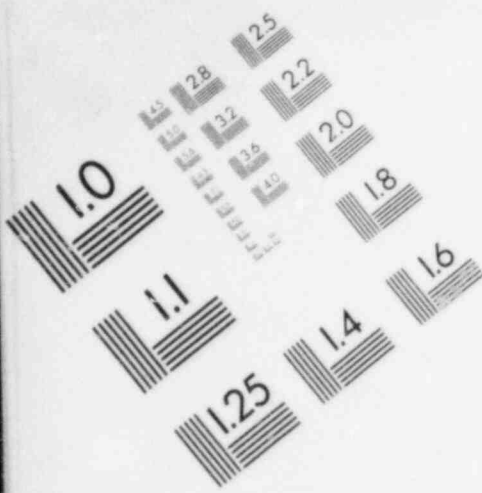
Atomic Safety & Licensing Appeal
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U.S. Nuclear Regulatory Commission
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IMAGE EVALUATION
TEST TARGET (MT-3)

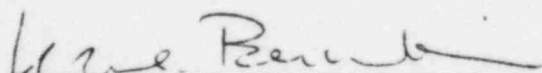


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
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METROPOLITAN EDISON COMPANY)	Docket No. 50-289 SP
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(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