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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

DOCKETED  
USNRC

'84 AGO 14 AIO:16

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

Docket No. 50-289 SP  
(Restart - Management Phase)

INTERVENOR THREE MILE ISLAND ALERT'S SECOND  
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 September 12, 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, staff, agents, representatives, consultants, officials, inspectors, investigators, auditors and accountants, 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 limited to GPU Nuclear Corporation and Metropolitan Edison Company, or its

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or its subsidiaries' branches, divisions, departments, sections, affiliates, offices, present and former officers, directors, management, board of directors, employees, staff, officials, agents, consultants, attorneys, representatives or their attorneys, representatives and agents.

(c) "Babcock and Wilcox" or "B&W" shall mean the Babcock & Wilcox Company, its subsidiaries, branches, divisions, departments, sections, affiliates, offices, and its 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) "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 media on which or through which information of any type is transmitted, recorded or preserved.

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

(f) "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, inspectors, investigators, or representatives, 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.

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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 REQUESTED

1. Notes, reports, memoranda or other documents generated in connection with interviews and/or contacts made by members of the Reconstituted OARP Review Committee to prepare, research and/or write the Special Report of the Reconstituted OARP Review Committee ("Special Report").

2. All documents related to inspections and/or visits of facilities made by members of the Reconstituted OARP Review Committee to prepare, research and/or write the Special Report.

3. All documents related to the extensive program for training and development of instructors referenced on page 20 of the Special Report, including but not limited to documents explaining the standardized method of instruction; written criteria for teaching instructors; and instructional materials.



4. All documents related to interviews and/or classroom visits made by Dr. Long and Dr. Coe, referenced on page 22 of the Special Report, including but not limited to interviews, reports, memoranda, and personal notes.

5. The TMI document "Control of Examinations for Units 1 and 2", referenced on page 23 of the Special Report.

6. Memorandum dated January 27, 1984, from B.P. Leonard, Operator Training Manager to the Operator Training Section with six attachments, referenced on pages 23 to 24 of the Special Report.

7. All documents related to the GPU Nuclear Training Advisory Council, referenced on page 22 of the Special Report, including but not limited to all minutes of meetings; reports; recommendations or suggestions; materials prepared for meetings of the Advisory Council; and internal memoranda establishing or instructing the Advisory Council.

8. All documents related to implementing procedures for security of all categories of exams, referenced on pages 25 to 27 of the Special Report.

9. All documents related to the current curricula for operators at TMI-1, including but not limited to course materials, curricula, tests, instructions or directions, and quizzes.

10. All documents related to meetings between new training instructors and the Director of Training and Education, including but not limited to all written instructions or directions given the instructors; any memoranda written by the Director concerning such

meetings, any personal notes of such meetings, and any recommendations, suggestions or changes made as a result of such meetings.

11. All documents related to the Vice President/Director of TMI-1's interviews with operators, including but not limited to the interview notes, memoranda or reports of the Director; notes, memoranda or minutes kept by the operators; reports issued as a result of such interviews; and all recommendations, suggestions or changes made as a result of such interviews.

12. Data-Design Laboratories' assessment report of selected TMI-1 training programs issued in 1982, referenced on page 29 of the Special Report.

13. GPU's INPO accreditation review of its STA Training Program during 1984, referenced on page 29 of the Special Report.

14. All documents related to the Management Analysis Corporation's decision analysis training course offered in 1980 or any modified programs offered after 1980, referenced on page 35 of the Special Report.

15. All documents related to guidance GPU provides for preparation of both oral and written examinations, including the matrix, referenced on page 36 of the Special Report.

16. The generic task analysis list prepared by INPO with GPU input, referenced on page 36 of the Special Report.

17. All instructor lesson plans used at any time at TMI-1 from 1979 to the present, referenced on page 45 of the Special Report.

18. All documents related to the weekly meetings between shift supervisors and the Training Department, referenced on page 45 of the Special Report, including but not limited to meeting minutes, personal notes of the meetings, and written recommendations, suggestions or changes made as a result of those meetings.

19. All documents related to the audits, reviews or inspections conducted by management of all TMI training programs, referenced on page 45 of the Special Report, including but not limited to audits conducted by Dr. Long, Dr. Coe, and Mr. Hukill.

20. All INPO evaluation findings from 1979 to the present concerning TMI-1's training program and management interface or management control over the training program, including but not limited to the evaluation finding referenced on page 47 of the Special Report.

21. The evaluations conducted by Mr. Kelly of the 1982 and 1983 written RO and SRO requalification examinations, answer keys and individual results on these written examinations, referenced on page 48 of the Special Report.

22. All documents related to management's observation of crews during the ATOG simulatory training at the B&W simulator, referenced on page 52 of the Special Report.

23. A table of contents or listing of all sections of the Operations Plant Manual for operator training, referenced on page 54 of the Special Report.

24. The informal job and task analyses completed by GPU



Nuclear Staff and the set constructed by INPO, both referenced on page 55 of the Special Report.

25. All TMI Self-Evaluation Reports from 1979 to the present, including but not limited to the Self-Evaluation Reports dated May 24, 1984, referenced on page 68 of the Special Report.

26. For the period 1982 to the present, all documents related to communications between top management and the training program, including but not limited to documents related to the following, all referenced on pages 75 to 77 of the Special Report:

(a) formal interviews of Mr. Hukill with license holders and with each license candidate as part of the certification process, referenced on page 75 of the Special Report;

(b) written certifications by Operations and Training Management, including all evaluations of trainees' performance and attitude;

(c) "Management Interface" meetings held for, inter alia, training crews,

(d) Mr. Hukill's attendance at four hours of training classes per month;

(e) bi-weekly reports of activities including training for upper management and off-shift tours by management;

(f) Mr. Hukill's periodic meetings with operators as a group and Dr. Long's employees' meetings at the site;

(g) management and supervisory development training program, including seminars, including but not limited to seminar

materials and curricula for the training program.

27. All documents related to or generated in connection with the following, referenced on pages 77 to 78 of the Special Report:

(a) Off-shift tours by management;

(b) simulatory training sessions attended by senior managers from Nuclear Assurance, Operations and Training;

(c) meetings between training and line functions to discuss training problems, including but not limited to minutes of such meetings, memoranda generated in connection with such meetings, and written recommendations, suggestions or changes resulting from such meetings;

(d) TMI-1 managers' meetings which Mr. Newton attends, insofar as they touch in any way on the training program, the qualifications of operators or training instructors, or management's interface and/or involvement with the training program.

28. A memorandum dated December 8, 1983, from P.R. Clark to S.L. Newton, referenced on page 78 of the Special Report.

29. The letter dated October 9, 1981, from R.C. Arnold to GPU employees, referenced on page 79 of the Special Report.

30. All documents listed on pages 80, 81, 85, 86 and 87, except items 2, 12, 14, 16, 17, 20, 24, and 25.

31. All documents related to Basic Energy Technology Associates, Inc.'s "A Report on a Review of Current and Projected Expenditures and Manpower Utilization for GPU Nuclear Corporation" (Febru-

ary 28, 1983) ("BETA Report"), including but not limited to all draft reports, all correspondence between BETA and GPU concerning the report; all instructions, directions or guidance given by GPU to BETA for preparation of the report; all GPU comments, remarks, criticisms or evaluations of the report; and all documents relating to actions taken by GPU in response to the BETA Report.

32. All documents related to "Priority Concerns of Licensed Nuclear Operators at TMI and Cyster Creek and Suggested Action Steps", Paul F. D'Arcy, Ph.D. and John R. Sauer, Ph.D., Rohrer, Hibler & Replogle, Inc. (March 15, 1983) ("RHR Report"), including but not limited to all draft reports, all correspondence between RHR and GPU concerning the report; all instructions, directions, or guidance given by GPU to RHR for preparation of the report; all GPU comments, remarks, criticisms or evaluations of the report; and all documents relating to actions taken by GPU in response to the RHR Report.

33. All documents related to "An Assessment of the GPU Nuclear Corporation Organization and Senior Management and Its Competence to Operate TMI-1", Admiral H.G. Rickover, USN (November 19, 1983), including but not limited to all interview reports or notes; all drafts of the reports or sections of the report; all correspondence between Admiral Rickover and GPU concerning preparation of the report; all instructions, directions or guidance given by GPU to Admiral Rickover for preparation of the report; and all documents relating in any way to actions taken by GPU in response to the Rickover Report.

34. All documents GPU intends to introduce in this reopened management hearing on the training program issue.

35. Written criteria GPU has developed for training instructors and the NRC Staff's comments, evaluations, or conclusions about these criteria, referenced on page 68 of ALAB-772.

36. All documents identified in response to Interrogatory Nos. 2, 3, 5, 6, 7, 8, 20, 27, 35, 38, 39, 42, 50, 51, 53, 55, 56, 57, 58, 59, 61, 62, 72, 74 and 75 in Intervenor TMIA's Second Set of Interrogatories.

Respectfully submitted,

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DATED: August 13, 1984

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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OFFICE OF SECRETARY  
DOCKETING & SERVICE

I hereby certify that I have served this 13th day of August,  
1984 a copy of the foregoing Second Request for Production to GPU; and  
Second Set of Interrogatories to GPU

on the following by mail, first-class, postage prepaid:

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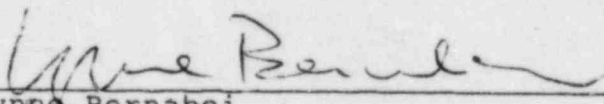
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