

August 16, 1984

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'84 AGO 17 P3:25

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

OFFICE OF THE SECRETARY
DOCKET No. 50-289 SP
(Restart-Management Remand)

LICENSEE'S FIRST SET OF INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO UCS

Pursuant to 10 C.F.R. §§ 2.740b and 2.741 and to the Atomic Safety and Licensing Board's "Memorandum and Order Following Prehearing Conference" of July 9, 1984, Licensee hereby requests that intervenor Union of Concerned Scientists (UCS) answer separately and fully in writing, and under oath or affirmation, each of the following interrogatories, and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to these interrogatories. Licensee makes this request of UCS in its capacity as a lead intervenor on the issue of training. Licensee has tried to limit its interrogatories of UCS to those areas of training in which UCS has asserted an interest. Licensee assumes that UCS's response will reflect the collective knowledge of any intervenor who has an interest in, or desires to participate, in the areas of training in which UCS intends to assume a lead

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intervenor role. If Licensee is incorrect in its assumption, UCS should promptly inform Licensee so that appropriate discovery requests can be provided to other intervenors as well.

Licensee's interrogatories are intended to be continuing in nature, and the answers should promptly be supplemented or amended as appropriate, pursuant to 10 C.F.R. § 2.740(e), should UCS or any individual acting on its behalf obtain any new or differing responsive information. The request for production of documents is also continuing in nature and UCS must produce immediately any additional documents it, or any individual acting on its behalf, obtain which are responsive to the request, in accordance with the provisions of 10 C.F.R. § 2.740(e).

As used hereinafter, "document(s)" mean all writings and records of every type in the possession, control or custody of UCS or any individual acting on its behalf, including, but not limited to, memoranda, correspondence, bulletins, minutes, notes, speeches, articles, transcripts, testimony, voice recordings and all other writings or recordings of any kind; "document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of UCS. Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum) and provide the following information, as applicable: document name, title, number, author, date of publication and publisher, addressee, date written or approved, and the

name and address of the person or persons having possession of the document. Also identify the specific portion or portions of the document (i.e., pages) upon which UCS relies.

GENERAL INTERROGATORIES

U-1(a). State the name, present or last known address, and present or last employer of each person, other than affiant, who provided information upon which UCS relied in answering each interrogatory herein.

(b). Identify all such information which was provided by each such person and the specific interrogatory response in which such information is contained.

U-2(a). Identify all documents upon which you relied in answering each interrogatory herein.

(b). Identify the specific interrogatory response(s) to which each such document relates.

U-3(a). Identify any other source of information, not previously identified in response to Interrogatories U-1 or U-2, which was used in answering the interrogatories set forth herein.

(b). Identify the specific interrogatory response(s) to which each such source of information relates.

INTERROGATORIES ON TRAINING

U-4. Identify the concerns UCS has about the adequacy of the licensed operator training program at TMI.

U-5. Identify the basis for each of the concerns identified in response to Interrogatory U-4.

U-6. Identify the remedy that UCS considers appropriate to respond to each of the concerns identified in response to Interrogatory U-4.

U-7. Does UCS consider memorization an inappropriate learning technique? If so, explain why. If not, explain the basis on which UCS would assess whether memorization is being used as an effective learning technique.

U-8. How would UCS determine what training is necessary to ensure that operators are able to run the plant?

U-9. Identify the specific subject-area(s) in Licensee's licensed operator training program that UCS believes require enhancement.

U-10. For each subject-area identified in response to Interrogatory U-9, explain the basis for UCS' view that training in that area should be enhanced.

U-11. Explain how, in UCS' view, each of the subjects identified in response to Interrogatory U-9 should be enhanced.

U-12. In UCS' view, does the format of Licensee's exams encourage cheating? Provide the basis for your answer.

U-13. Identify the standard on which UCS relies to determine whether the format of Licensee's exams encourage cheating.

U-14. Does UCS believe licensed operators should be required to spend additional time at the simulator? If so, explain the basis for your answer.

U-15. Does UCS believe licensed operators should be tested on the simulator? If so, explain the basis for your answer.

U-16. Does UCS believe that the licensed operators are capable of safely operating TMI-1 during normal operation or accident conditions? If not, explain the basis for your answer, especially as it relates to any perceived deficiencies in the training program.

U-17. Identify any documents on which UCS relies to support its position in response to Interrogatory U-16.

U-18. What capabilities, if any, would you require operators to have that you believe they presently lack?

U-19. In UCS' opinion, do Licensee's exams reliably measure the operators' ability to safely operate TMI-1? If not, why not?

U-20. Identify each deficiency UCS believes exists in Licensee's examinations.

U-21. Does UCS believe the NRC exams should be relied upon as a reliable measure of an operator's ability to safely operate TMI-1? If not, why not?

U-22. Does UCS believe the NRC exams are relied upon by Licensee as a reliable measure of an operator's ability to safely operate TMI-1? Explain the basis for UCS' view.

U-23. Identify the concerns UCS has about the TMI licensed operator training program, if any, based on its review of the RHR Report.

U-24. Identify each specific portion (i.e., particular page(s) and particular statement(s)) of the RHR Report on which UCS relies in formulating its response to Interrogatory U-23.

U-25. Identify the concerns UCS has about the TMI licensed operator training program, if any, based on its review of the BETA Report.

U-26. Identify each specific portion (i.e., particular page(s) and particular statement(s)) of the BETA Report on which UCS relies in formulating its response to Interrogatory U-25.

U-27. Identify any criticisms UCS has of the Special Report of the Reconstituted OARP Review Committee, dated June 12, 1984.

U-28. Identify each specific portion (i.e., particular page(s) and particular statement(s)) of the Special Report of the Reconstituted OARP Review Committee on which UCS relies in formulating its response to Interrogatory U-27.

Respectfully submitted,

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Dated: August 16, 1984

August 16, 1984

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
)	(Restart-Management Remand)
(Three Mile Island Nuclear)	
Station, Unit No. 1))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's First Set of Interrogatories and First Request for Production of Documents to UCS" were served this 16th day of August, 1984, by deposit 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

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

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