

August 30, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

'84 AGO 31 A11:03

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

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

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 the Aamodts 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'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 the Aamodts or any individual acting on their behalf obtain any new or differing responsive information. The request for production of documents is also continuing in nature and the Aamodts must produce immediately any additional documents

they, or any individual acting on their 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 the Aamodts or any individual acting on their 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 the Aamodts. 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 the Aamodts rely.

#### GENERAL INTERROGATORIES

A-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 the Aamodts 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.

A-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.

A-3(a). Identify any other source of information, not previously identified in response to Interrogatories A-1 or A-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

A-4. Identify the concerns the Aamodts have about the adequacy of the licensed operator training program at TMI.

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

A-6. Identify the remedy that the Aamodts consider appropriate to respond to each of the concerns identified in response to Interrogatory A-4.

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

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

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

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

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

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

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

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

A-15. Do the Aamodts believe licensed operators should be tested on the simulator? If so, explain the basis for your answer.

A-16. Do the Aamodts 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.

A-17. Identify any documents on which the Aamodts rely to support its position in response to Interrogatory A-16.

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

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

A-20. Identify each deficiency the Aamodts believe exists in Licensee's examinations.

A-21. Do the Aamodts 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?

A-22. Do the Aamodts 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 the Aamodts' view.

A-23. Identify the concerns the Aamodts have about the TMI licensed operator training program, if any, based on its review of the RHR Report.

A-24. Identify each specific portion (i.e., particular page(s) and particular statement(s)) of the RHR Report on which the Aamodts rely in formulating their response to Interrogatory A-23.

A-25. Identify the concerns the Aamodts have about the TMI licensed operator training program, if any, based on its review of the BETA Report.

A-26. Identify each specific portion (i.e., particular page(s) and particular statement(s)) of the BETA Report on which the Aamodts rely in formulating their response to Interrogatory A-25.

A-27. Identify any criticisms the Aamodts have of the Special Report of the Reconstituted OARP Review Committee, dated June 12, 1984.

A-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 the Aamodts rely in formulating its response to Interrogatory A-27.

Respectfully submitted,

*Deborah B. Bauser*

---

Ernest L. Blake, Jr., P.C.  
Deborah B. Bauser  
SHAW, PITTMAN, POTTS & TROWBRIDGE  
1800 M Street, N.W.  
Washington, D.C. 20036  
(202) 822-1215

Counsel for Licensee

Dated: August 30, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC  
'84 AGO 31 A11:03

Before the Atomic Safety and Licensing Board

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

Service List

Administrative Judge  
Ivan W. Smith  
Chairman, Atomic Safety &  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Administrative Judge  
Sheldon J. Wolfe  
Atomic Safety & Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Administrative Judge  
Gustave A. Linenberger, Jr.  
Atomic Safety & Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Jack Goldberg, Esq.  
Office of Executive Legal Dtr.  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Chairman, Atomic Safety &  
Licensing Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Chairman, Atomic Safety &  
Licensing Appeal Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Thomas Y. Au, Esq.  
Office of Chief Counsel  
Dept. of Environmental Resources  
505 Executive House  
P.O. Box 2357  
Harrisburg, PA 17120



Docketing & Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Mr. Norman Aamodt  
R. D. 5  
Coatesville, PA 19320

Joanne Doroshov, Esq.  
The Christic Institute  
1324 North Capitol Street  
Washington, D.C. 20002

Mr. Henry D. Hukill  
Vice President  
GPU Nuclear Corporation  
P.O. Box 480  
Middletown, PA 17057

Michael F. McBride, Esq.  
LeBoeuf, Lamb, Leiby & MacRae  
1333 New Hampshire Avenue, N.W.  
Suite 1100  
Washington, D.C. 20036

Michael W. Maupin, Esq.  
Hunton & Williams  
707 East Main Street  
P.O. Box 1535  
Richmond, VA 23212

Administrative Judge  
Christine N. Kohl  
Atomic Safety & Licensing  
Appeal Board  
U.S. Nuclear Regulatory  
Washington, D.C. 20555

Ellyn R. Weiss, Esq.  
William S. Jordan, III, Esq.  
Harmon, Weiss & Jordan  
2001 S Street N.W., Suite 430  
Washington, D.C. 20009

Lynne Bernabei, Esq.  
Government Accountability  
Project  
1555 Connecticut Avenue  
Washington, D.C. 20009

Ms. Louise Bradford  
TMI ALERT  
1011 Green Street  
Harrisburg, PA 17102

Administrative Judge  
Gary J. Edles, Chairman  
Atomic Safety & Licensing  
Appeal Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Administrative Judge  
John H. Buck  
Atomic Safety & Licensing  
Appeal Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

August 30, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '84 AGO 31 A11:03

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

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Docket No. 50-289  
(Restart-Management Remand)

CERTIFICATE OF SERVICE

I hereby certify that copies of counsel for Licensee's letter to the Aamodts and "Licensee's First Set of Interrogatories and First Request for Production of Documents to the Aamodts" were served this 30th 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 )  
 )  
METROPOLITAN EDISON COMPANY ) Docket No. 50-289 SP  
 ) Restart  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

Service List

Administrative Judge  
Ivan W. Smith  
Chairman, Atomic Safety &  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Administrative Judge  
Sheldon J. Wolfe  
Atomic Safety & Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Administrative Judge  
Gustave A. Linenberger, Jr.  
Atomic Safety & Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Jack Goldberg, Esq.  
Office of Executive Legal Dtr.  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Chairman, Atomic Safety &  
Licensing Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Chairman, Atomic Safety &  
Licensing Appeal Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Thomas Y. Au, Esq.  
Office of Chief Counsel  
Dept. of Environmental Resources  
505 Executive House  
P.O. Box 2357  
Harrisburg, PA 17120

Docketing & Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Mr. Norman Aamodt  
R. D. 5  
Coatesville, PA 19320

Joanne Doroshov, Esq.  
The Christic Institute  
1324 North Capitol Street  
Washington, D.C. 20002

Mr. Henry D. Hukill  
Vice President  
GPU Nuclear Corporation  
P.O. Box 480  
Middletown, PA 17057

Michael F. McBride, Esq.  
LeBoeuf, Lamb, Leiby & MacRae  
1333 New Hampshire Avenue, N.W.  
Suite 1100  
Washington, D.C. 20036

Michael W. Maupin, Esq.  
Hunton & Williams  
707 East Main Street  
P.O. Box 1535  
Richmond, VA 23212

Administrative Judge  
Christine N. Kohl  
Atomic Safety & Licensing  
Appeal Board  
U.S. Nuclear Regulatory  
Washington, D.C. 20555

Ellyn R. Weiss, Esq.  
William S. Jordan, III, Esq.  
Harmon, Weiss & Jordan  
2001 S Street N.W., Suite 430  
Washington, D.C. 20009

Lynne Bernabei, Esq.  
Government Accountability  
Project  
1555 Connecticut Avenue  
Washington, D.C. 20009

Ms. Louise Bradford  
TMI ALERT  
1011 Green Street  
Harrisburg, PA 17102

Administrative Judge  
Gary J. Edles, Chairman  
Atomic Safety & Licensing  
Appeal Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Administrative Judge  
John H. Buck  
Atomic Safety & Licensing  
Appeal Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555