

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION DOCKETED  
UNITED STATES

Before the Atomic Safety and Licensing Board P12:26

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

UNION OF CONCERNED SCIENTISTS' FIRST SET  
OF INTERROGATORIES TO GENERAL PUBLIC UTILITIES

TO: GENERAL PUBLIC UTILITIES NUCLEAR CORPORATION

Pursuant to 10 C.F.R. 2.740(b), the Union of Concerned Scientists hereby requests General Public Utilities Nuclear Corporation ("GPU" or "license") to answer the following interrogatories separately, fully, in writing and under oath. All persons who answered or assisted in answering these interrogatories should be identified and the answers to which (s)he contributed indicated.

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

INSTRUCTIONS

A. You must divulge all information that 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.

B. 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 or communication, and the location of any such correspondence, notes, memoranda or other document.

C. 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 was prepared; and whether the document will be made available for inspection and copying, and the site of such voluntary production.

D. Where identification of a person is sought, persons working for GPU may be identified by name and job title. Other persons shall be identified by name, job and address.

E. If GPU 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 that are no longer in existence, in answer to such interrogatory:

1. identify what information was maintained;
2. identify all documents that 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 requires, 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, or 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, its 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.

(iii) "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, devices or media 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.

(iv) "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.

(v) "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.

NOTE ON NONDUPLICATION

UCS has attempted to avoid duplication of interrogatories posed by other intervenors. Should such duplication occur despite our efforts, you may identify the duplicative interrogatory and the answer(s) that you have provided in response to another intervenor's interrogatory that you believe are responsive to UCS' interrogatory be broader than the other intervenor's, you must provide the additional information as well as identifying what you have already provided.

INTERROGATORIES

1. Regarding any document responsive to UCS' First Request for Production of Documents of whose existence GPU is aware, or that GPU knew existed in the past, and that 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. Identify all individuals whom GPU intends to call as witnesses on the remanded issues related to the GPU training program. For each such witness, state or identify the following:

- a. The individual's qualifications, including educational and employment history and publications.
- b. All of the individual's contracts, consulting arrangements, advisory positions, and other relationships with GPU.
- c. All regulatory proceedings of any type in which the individual has testified. For each proceeding, state the purpose of the hearing, the subject of the testimony, and the date, time, and place of the testimony.
- d. All documents reviewed by the individual in the course of preparing testimony for this proceeding.
- e. All other persons whom the individual interviewed or consulted in the course of preparing testimony for this proceeding. In each case, state the subject of the interview or conversation and the advice or information obtained from the person in question.

- f. All documents that the individual intends to use in connection with forming the opinions contained in his/her testimony in this proceeding.
- g. The topics to be covered in the individual's testimony.
- h. The conclusions reached in the individual's testimony and the bases for those conclusions.

(Note: Overlaps with, but is broader than Interrogatory 75 in TMIA's Second Set of Interrogatories.)

3. Identify all individuals who currently hold licenses as Reactor Operators or Senior Reactor Operators for Three Mile Island-1. For each such individual, state or identify the following:

- a. The dates of the individual's employment by GPU.
- b. Each position held by the individual at GPU, the dates he/she held that position, and the responsibilities of the position.
- c. All training activities in which the individual has been enrolled or involved that are related to qualifying to hold a license as a Reactor Operator or Senior Reactor Operator. For each such training activity, state the date or dates of the activity, the dates the individual actually attended the activity, the purpose and scope of the activity, the number of hours required for the activity, and the actions required of the individual during the activity.



- d. The dates of all examinations or tests of any type (including quizzes and oral examinations or tests) that the individual has taken during the training referred to in the previous paragraph (c) or that the individual has taken for the purpose of obtaining or maintaining a license as a Reactor Operator or a Senior Reactor Operator for GPU. For each such examination or test, state the purpose, the subject matter or matters, the individual's grade, and the consequence (e.g., promotion, licensing, retraining) of the individual's grade.
- e. The dates of all examinations or tests of any type that the individual has taken for the purpose of obtaining or maintaining a license as a Reactor Operator or a Senior Reactor Operator before the individual was employed by GPU. For each such examination or test, state the purpose, the subject matter or matters, the individual's grade, and the consequence (e.g., promotion, licensing, retraining) of the individual's grade.

4. Answer all parts of Interrogatory #3 for all individuals who have held licenses to act as Reactor Operators or Senior Reactor Operators for TMI-1 since March 28, 1979, but who either no longer hold such a license or are no longer employed at TMI-1. In addition, if the individual is no longer employed at TMI-1, state the date the individual's employment was terminated and the reason for the termination.

5. For each examination or test identified in response to Interrogatories ## 3 or 4, state the name of the person or persons who prepared the examination or test, the name of the person or persons who administered the examination or test, and the name of the person or persons who graded the examination or test.

6. For each week from March 28, 1979, to the present, describe all training activities carried out at TMI-1 during the week, including the purpose and subject matter of each activity, the number of hours involved in the activity, the number of people for whom the training was intended, the actual attendance at the training activities, the names and positions of the people who administered the training, and any examinations or tests that were part of the training or for which the training was intended to prepare the participants.

7. When did GPU have enough qualified personnel at TMI-1 to begin the six-shift rotation described in the special report of the reconstructed OARP Review Committee at page 8?. When did it actually begin the rotation?

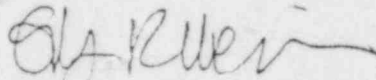
8. Identify all individuals currently serving as instructors for training provided at TMI-1. For each such individual, state the following:

- a. If individual holds a college degree, his/her educational and employment history and qualifications to serve as an instructor.
- b. The subject matter for which the individual serves as an instructor.
- c. If the instructor holds an RO or SRO license, when was it received?
- d. Has the instructor ever failed a utility or NRC-administered examination, including those for RO, SRO, OARP or annual requalification? If so, identify and provide each failed examination.
- e. How long has each individual served as an instructor?

9. Identify all individuals who prepare examination questions for GPU training programs and provide their educational and employment history and qualifications to design examinations.

10. Identify all individuals who prepared examination questions for the OARP program and provide their educational and employment history and qualifications to design examinations.
11. Identify all individuals who grade examinations and provide their educational and employment history and qualifications to grade examinations.
12. Identify all individuals who grade the OARP examinations and provide their educational and employment history and qualifications to grade examinations.
13. Describe the process, if any, by which examinations are evaluated by CPU for difficulty or for validity.
14. Describe the process by which written and oral examinations are designed and questions prepared by GPU.

Respectfully submitted,



Elynn R. Weiss



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Concerned Scientists

Dated: August 28, 1984

August 28, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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 )

CERTIFICATE OF SERVICE

I hereby certify that copies of UNION OF CONCERNED SCIENTISTS' FIRST SET OF INTERROGATORIES TO GENERAL PUBLIC UTILITIES AND UNION OF CONCERNED SCIENTISTS' FIRST REQUEST TO GENERAL PUBLIC UTILITIES FOR PRODUCTION OF DOCUMENTS were served this 28th day of August, 1984, by depositing them in the U.S. mail, first class postage prepaid, to the parties on the attached service list.

  
William S. Jordan, III

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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