

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 P4:49  
 ) (Restart - Management Phase)  
(Three Mile Island Nuclear )  
Station, Unit No. 1) )

DOCKETED  
USNRC

'84 SEP -4 P4:49

INTERVENOR THREE MILE ISLAND ALERT'S  
SECOND SET OF INTERROGATORIES TO  
NUCLEAR REGULATORY COMMISSION STAFF

TO: Atomic Safety and Licensing Board Chairman Ivan W. Smith

Intervenor Three Mile Island Alert ("TMIA"), pursuant to 10 C.F.R. 2.720(h)(2)(ii) submits the following interrogatories to Atomic Safety and Licensing Board Chairman Ivan W. Smith and requests that these interrogatories, necessary to a proper determination before this Licensing Board and whose answers are not readily obtainable from any other source, be answered fully, separately, in writing and under oath by the Nuclear Regulatory staff ("NRC staff") by or before September 18, 1984.

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

INSTRUCTIONS TO NRC STAFF

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 executives, commissioners, employees, staff, directors, officers, trustees, managers, attorneys, inspectors, investigators, consultants, accountants, offices, branches, sections, or their agents, representatives or attorneys.

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 person is required, state the following: his or her full name; his/her current address; if his/her current addresses are unknown, his/her last known home and business address; all position(s) he/she has held with GPU at any time; his/her home and business address at the time for which the interrogatory requests information; his/her current employer and position.

D. Where identification of a document is required, the following shall be separately stated as to each such document: 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; the last known address of the addressee and his/her name, title, affiliation, presently and at the time the document was prepared; and last known address of every person to whom a copy of the document was to be sent, other than the addressee described above; the names and addresses 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 normally kept and the custodian thereof; whether the document will be made available for inspection and copying; and the site of such voluntary production.

E. If the NRC staff 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. In 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 such 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, and its present and former commissioners, administrators, management, employees, agents, staff, investigators, inspectors, accountants, auditors, representatives, consultants or officials, 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, or its and 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) "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.

(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.

INTERROGATORIES

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

1. Identify all requirements of the Nuclear Regulatory Commission, relating in any way to GPU's operator training program, including but not limited to all requirements imposed on GPU by either NRC adjudicatory bodies; the NRC staff, or the Commission.

2. Identify all evaluations of GPU's operator training program made by the NRC at any time from 1979 to the present, including but not limited to any inspection or SALP reports.

3. Identify all deficiencies, failings, problems, or weaknesses the NRC staff believes to have existed in GPU's training program at any time from 1979 to the present.

With respect to each deficiency, failing, problem or weakness identified above, state whether the NRC staff believes that it currently exists. For any such deficiency, failing, problem or weakness which at one time existed but no longer exists, explain what if any action GPU has taken to eliminate it. For any deficiency, failing, problem or weakness which continues to exist, state the NRC staff's position as to the reason it continues to exist, and the corrective action necessary to resolve or eliminate it.

4. Identify all corrective actions, improvements, or modifications to GPU's training program, which GPU has taken from 1979 to the present, which the NRC Staff, the Commission, or any adjudicatory body of the NRC has recommended, suggested, directed, mandated or otherwise required GPU to effect.

Identify all actions GPU has taken to implement the improvements, corrective actions or other modifications identified above.

5. Identify all persons the NRC staff intends to call as a witness on the remanded issues of the Dieckamp mailgram and the adequacy of GPU's training program. For each such person identified, identify the following:

(a) the nature or substance of his testimony;

(b) his qualification, access to information, or other reason that he is being asked to testify as to the information identified in response to subpart(a) above;

(c) his position or relationship to GPU or the NRC staff at any time from the time of the accident to the present; including but not limited to any contracts, consulting arrangements, advisory positions or other relationships with GPU or the NRC Staff he has held;

(d) all documents he has reviewed or will review to prepare his testimony;

(e) all persons whom he has consulted or will consult to prepare his testimony;

(f) the nature and substance of any discussions, conversations, communications, and other contacts he has had or will have with the persons identified in response to subpart(e) above.

(g) all documents he intends to rely on or to use in support of any opinions, evaluations, conclusions, or recommendations he has included in testimony;

(h) the current location and custodian of all documents identified in response to subparts (d) and (g) above.

6. Identify and produce all documents which the NRC Staff intends to introduce in the hearing or through prefiled testimony on the remanded issues of the Dieckamp mailgram and the adequacy of GPU's training program.

Respectfully submitted,

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Attorneys for Three Mile Island  
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