

August 31, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'84 SEP -4 P3:59

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 SP
(Restart-Management Remand)

LICENSEE'S THIRD SET OF INTERROGATORIES AND
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS TO TMIA

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 Three Mile Island Alert (TMIA) 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 TMIA 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 TMIA

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 TMIA 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 TMIA. 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 TMIA relies.

GENERAL INTERROGATORIES

T-31(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 TMIA 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.

T-32(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.

T-33(a). Identify any other source of information, not previously identified in response to Interrogatories T-31 or T-32, 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

T-34. Does TMIA believe that the licensed operators are capable of safely operating TMI-1 during normal operation or accident conditions? If not, explain the basis for its answer, especially as it relates to any perceived deficiencies in the training program.

T-35. Identify any documents on which TMIA relies to support its position in response to Interrogatory T-34.

T-36. What capabilities, if any, would you require operators to have that you believe they presently lack?

T-37. In TMIA's opinion, do Licensee's exams reliably measure the operators' ability to safely operate TMI-1? If not, why not?

T-38. Identify each deficiency TMIA believes exists in Licensee's examinations.

T-39. Does TMIA 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?

T-40. Does TMIA 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 TMIA's view.

Respectfully submitted,

Deborah B. Bauser

Ernest L. Blake, Jr., P.C.
Deborah B. Bauser
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Counsel for Licensee

Dated: August 31, 1984

August 31, 1984

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OFFICE OF SECRETARY
DOCKETING & SERVICE
Docket No. 50-2894
(Restart-Management Remand)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Third Set of Interrogatories and Third Request for Production of Documents to TMIA" were served this 31st 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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AUG 30 1984
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August 28, 1984

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Re: GPU Interrogatories, TMI-1 Restart

Dear Mr. Blake, *ERW*

On August 21, 1984, I received your first set of interrogatories and document requests to UCS. You state that you "assume" that UCS's response "will reflect the collective knowledge of any intervenor who has an interest in or desires to participate" in the covered areas of training. You ask us to inform you if licensee is "incorrect in its assumption."

This is to inform you that UCS's responses will reflect UCS's knowledge regarding the issues in question. While the agreement on lead intervenors anticipates that UCS will act as lead during the hearing on some training issues, and we are in fact cooperating with other parties during discovery, particularly to prevent insofar as possible serving duplicative requests on GPU, UCS does not have the resources nor is it obliged under any order to answer discovery requests with any but UCS's own knowledge. The intervenors maintain their independent party status in this case as I am sure you are aware, just as GPU and the NRC staff do.

Very truly yours,



Ellyn R. Weiss

cc: TMI-1 licensing Board Service List

ERW:nf