

September 4, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

Before the Presiding Officer

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

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UNION OF CONCERNED SCIENTISTS' MOTION TO REQUIRE
THE NRC STAFF TO ANSWER UCS' FIRST SET OF INTERROGATORIES

The Union of Concerned Scientists ("UCS") moves that the Presiding Officer require the NRC Staff to answer the interrogatories set out in UCS' First Set of Interrogatories to NRC Staff, which accompanies this motion. The answers to these interrogatories are "necessary to a proper decision in the proceeding" for the following reasons:

1. Interrogatory 1 relates to documents sought by UCS in its First Request for Production of Documents to the NRC Staff. The information at issue would assist in the development of the record with respect to the documents in question. In particular, since the interrogatory relates to documents that may now be missing, the Staff's answers may bear on the credibility of or basis for the Staff's testimony. It is essential to the record that intervenors be able to probe the credibility of and basis

for Staff testimony.

2. Interrogatory 2 relates to individuals whom the Staff intends to call as witnesses. It probes the qualifications, bias, and expertise of these individuals, as well as the basis for their testimony. If the Staff is to present witnesses, such probing is necessary to determine the credibility and validity of their testimony.

3. Interrogatories 3, 4, 6, and 7 relate to development and use of NRC administered operator examinations. Answers are necessary to a proper decision because they relate to the issue of Licensee reliance upon NRC examinations as a measure of operator competence, an issue explicitly recognized by the Board. Since the NRC Staff develops and administers these examinations, its testimony on the points raised in these interrogatories is crucial to the record on this issue. In particular, it bears upon the propriety of Licensee reliance upon the NRC examinations. Moreover, the answers to these questions are relevant to the NRC Staff's knowledge of the training program at TMI-1. If the Staff is to present evidence on the training program, UCS is entitled to seek from the Staff information that relates to the basis and completeness of the Staff's knowledge of that subject.

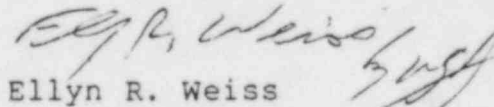
4. The remaining Interrogatories relate to the actions that the Staff has taken to review and evaluate GPU's training program and the Staff's opinions concerning the program. The adequacy of that program is the central issue in this remand. These


interrogatories are necessary to probe the basis for Staff testimony on that issue. If the Staff is to present such testimony, these interrogatories must be allowed so that intervenors can challenge that testimony.

Since all of the Interrogatories seek descriptions of Staff actions or opinions, there is no other source from which the information could be obtained.

Accordingly, UCS moves that the Presiding Officer direct the Staff to answer these Interrogatories.

Respectfully submitted,


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