

September 4, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
Before the Atomic Safety and Licensing Board

DOCKETED  
USNRC

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OFFICE OF SECRETARY  
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BRANCH

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' SECOND SET  
OF INTERROGATORIES AND DOCUMENT REQUESTS  
TO GENERAL PUBLIC UTILITIES

TO: GENERAL PUBLIC UTILITIES NUCLEAR CORPORATION

Pursuant to 10 C.F.R. 2.740(b) and 2.741, the Union of Concerned Scientists hereby requests General Public Utilities Nuclear Corporation ("GPU" or "licensee") to answer the following interrogatories separately, fully, in writing and under oath, and to provide access to the requested documents. All persons who answered or assisted in answering the interrogatories should be identified and the answers to which (s)he contibuted indicated.

These interrogatories and document requests are deemed to be continuing. And any additional information relating in any way to these interrogatories and any documents relating to these document requests that 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.

The instructions and definitions to be used in answering these interrogatories and document requests are the same as those stated in Union of Concerned Scientists First Set of Interrogatories to General Public Utilities and First Request to General Public Utilities for Production of Documents.

The following questions relate to the Special Report of the Reconstituted OARP Review Committee, June 12, 1984. Unless otherwise indicated, page references are to that document.

1. State on what days and for what hours the Reconstituted OARP Review Committee (hereafter "Committee") met during the weeks of May 28, 1984 and June 4, 1984. If all five members were not present at all times, indicate which members were present.

2. If any person(s) other than members of the committee were present during any of these meetings, interviews or reviews of the committee (excluding the person interviewed), provide the name(s) and identification by job title if a member of GPU or subsidiary organizations and include address if not associated with GPU or subsidiaries.

3. Provide any written directions, memoranda, letters or any other documents from GPU to the committee or its members indicating the subjects that they were to consider, the scope of their review, any limitations in time or resources, and any other communication between GPU and the committee.

4. The June 12, 1984, Special Report of the Committee (hereafter "Special Report") states page 3: "Whether or not the committee undertakes the more definitive study is a matter

for GPU Nuclear to decide at a later date."

a. Has GPU decided to undertake the "more definitive study" referred to above?

b. Name the person(s) who decided whether or not to undertake the "more definitive study and provide any GPU memoranda, letters and other documents related to the decision.

c. If GPU decided to undertake the "more definitive study," provide the "more definitive study," and any and all drafts thereof.

d. If the "more definitive study" has been undertaken but no written material is yet completed, describe the manner in which the "more definitive study" is different from the Special Report in scope, subject matter covered, persons interviewed, documents reviewed, facilities inspected, and any other pertinent differences.

e. If the "more definitive study" has been undertaken, provide any written directions, memoranda, letters and other documents from GPU to the Committee concerning the subjects to be considered, the scope of the review, any limitations on time or resources and any other communication between GPU and the committee.

5. Provide any and all drafts of the Special Report and sections thereof.

6. Provide all notes of the Committee and members thereof.

7. Identify all persons other than the Committee members who were given copies of the Special Report in draft or final form prior to its submission to NRC.

8. Identify any persons who reviewed or commented on the Special Report prior to its submission to NRC and provide copies of any notes or other documents that these persons wrote or had written that are related to their review or comments.

9. State which individual Committee members were assigned to which "areas of responsibility"<sup>3</sup> (p. 4) Provide all "individual reports" (p. 4) and describe the manner in which and the time period during which the "individual reports" were reviewed by the full Committee.

10. During what specific period of time was the Special Report actually written?

11. Was any person(s) other than members of the Committee involved in the preparation, drafting and/review of the Special Report? If so, identify and describe his/her function.

12. Which "training facilities" were inspected by the Committee? (p.3) What did such "inspections" consist of, specifically? What member(s) of the Committee conducted which inspections?

13. During the preparation of the Special Report, did the Committee observe any actual training? If so a) describe what was observed, b) state the time and the duration of the observation(s), c) state what member(s) of the Committee who conducted the observation(s), d) provide any written documentation of such observation(s).

14. During the preparation of the Special Report, did the Committee review the content of any GPU administered

examination? If so a) identify which examination(s) were reviewed, b) describe what the review consisted of, c) state what member(s) of the committee conducted the review(s), d) provide any written documentation of such review(s).

15. During the preparation of the Special Report, did the Committee review any GPU Operating Procedures, Emergency Procedures or ATOG guidelines to determine whether the training program is consistent with said procedures and guidelines?

16. If the answer to #15 above is "yes" a) identify the procedures and guidelines reviewed, b) describe the nature of the review, c) provide any written documentation of such review, d) provide the results of the review, e) identify which member(s) of the committee conducted the review(s).

17. During the preparation of the Special Report, did the Committee or any members thereof review the content of any NRC examinations for any purpose? If so, a) identify the reviewer(s), b) describe the nature and purpose of the review, c) state the amount of time devoted to the review, d) identify the examination(s) reviewed, e) provide the results of the review, f) provide any written documentation of the review.

18. The Special Report states at pp. 5-6 that the cheating incidents involve "a very few individuals." The Appeal Board concluded that one-fourth of those who took the April, 1981, NRC exams were either directly involved in cheating or were implicated in some manner that could not be satisfactorily

explained. ALAB-772, Sl.op at 63-64. Does the committee consider this to be "a very few individuals?"

19. State specifically which persons by name or letter designation are considered by the committee to constitute the "very few individuals" referred to on p.6.

20. The Committee reproduces at pp. 11-12 and "endorses" the two-page section on training taken from a report prepared by Admiral Rickover et al. in November, 1983. The Committee states (p. 10) that this section "comprehensively summarizes the development of the training activities since 1979-1980 when the OARP Review Committee was preparing its report." (p. 10) State specifically which elements of the training program as described in the reproduced excerpt from the Rickover Report were developed or significantly changed after the OARP's original Report and thus were not considered by the original OARP.

21. The Special Report states (p. 13) that the current T-E staff and budget is more than an order of magnitude increase since the TMI-2 accident. How much has the staff and budget been increased since the time that the OARP testified before the Special Master?

22. The Committee States (p. 16) that it is "not privy to the basis for assignments and promotions within GPU Nuclear" and thus cannot "second guess" GPU's decisions regarding Messrs. Long, Coe, Newton and Frederick, for example. Did the Committee ask GPU or any GPU employee for the "basis for the

assignments and promotions" of the named individuals? If so, what was the response? Provide any documentation.

23. Has the Committee considered in any way the roles of the individuals named in #22 above in the cheating incidents and in the implementation of the training program as described by the Special Master, ASLB and Appeal Board. If so, describe the manner in which the Committee considered such roles.

24. Did the Committee reach any conclusion concerning whether the individuals named in #22 above have demonstrated the attitude required to effectively implement a training program? If so, provide all material considered by the Committee in reaching such conclusion(s).

25. Does the Committee believe that any of the individuals named in #22 bear any responsibility or should be held accountable in any way for the "widespread disrespect" for the training and testing program found by the ASLB? See 16 NRC at 318-319. If so, identify who bears responsibility and who should be held accountable and in what manner.

26. Does the Committee believe that any individuals beyond the actual cheaters (O, W, G and H) bear any responsibility or should be held accountable in any way for the "widespread disrespect" for the training and testing program. If so, identify who bears responsibility and should be held accountable and in what manner.

27. Does the Committee agree with the Appeal Board that "...the underpinnings of the Board's earlier decision (i.e., the consultants' predictive testimony) were shaken" by the

evidence in the reopened proceeding on cheating? ALAB-772, Sl. op. at 65 n.49. Explain why or why not.

28. The Special Report states: "The Committee believes that any deficiencies that existed at the time of the cheating have been corrected."(p. 19) Describe the deficiencies that existed at the time of the cheating.

29. State specifically how each deficiency described in #28, above has been corrected.

30. The Appeal Board stated: "One or more of the instructors evaluated by The OARP Committee were involved in the cheating episodes.... Would that alter the committee's generally favorable perceptions of the instructors?" ALAB-772, Sl. op. at 68, citations omitted. Provide the Committee's answer to the quoted question posed by the Appeal Board.

31. The Special Report describes a detailed rating sheet for evaluation of instructors. (p. 21) During the preparation of the Special Report, did the committee itself evaluate any instructors according to this rating system?

32. If the Committee did so evaluate any instructors, a) provide the rating sheet(s), b) identify the evaluator(s), c) describe the method of evaluation, d) provide any written documentation of such evaluation(s).

33. During the preparation of the Special Report did the Committee review the content of the questions used in any aspect of GPU's training program?



34. If the Committee reviewed the content of exam questions, a) provide the questions reviewed, b) identify the reviewer(s), c) describe the process of evaluation, d) describe the criteria used by the reviewer(s), e) provide or describe the evaluation(s), f) provide any written documentation of the review and/or the criteria used.

35. During the preparation of the Special Report, did the Committee review any examinations (either GPU or NRC) to determine whether "the licensee and NRC examinations are an effective way to measure an operator's ability to run the plant?" ALAB-772, Sl.op at 63.

36. The Special Report States: "All licensed operator requalification examinations are closed book."(p.26) Which examinations may be "open book?" Describe the procedures for open book examinations.

37. May any examinations be "take-home"? If so, identify.

38. During the preparation of the Special Report, did any members of the Committee observe the administration of any examinations: If so, a) identify the observer(s), b) state what examination(s) on what dates were observed, c) state the duration of the observation, d) provide or describe the results of the observation, e) provide any written documentation.

39. The Special Report states at p. 28: "Curricula incorporating all of these topics [as listed in Recommendation A] have been developed..." State what the Committee did during

the preparation of the Special Report to review and evaluate the content of the "curricula incorporating all of these topics." Provide all documentation of any such review(s) and evaluation(s) and identify the reviewer(s).

40. The Special Report states at p. 29 that "the NRC has reviewed many aspects of the program...." Identify the NRC reviews that were considered by the Committee during the preparation of the Special Report.

41. Provide the Data-Design Laboratories report referred to on p. 29 of the Special Report.

42. Recommendation D on p. 30 deals with the Band W simulator programs. State what the Committee did during the preparation of the Special Report to evaluate whether the simulator programs are a) "complementary to other operator training", and b) "responsive to changes that may occur in the TMI Control Room design and/or procedures." Provide all written documentation of such evaluation and identify the evaluator(s).

43. State what the Committee did during the preparation of the Special Report to evaluate the Basic Principles Training Simulator (p. 31) and its use in GPU training programs. Provide all written documentation of any such evaluation and identify the evaluator(s).

44. The Special Report at pp. 32-33 briefly describes a "program for instructors developed and implemented since the fall of 1980." Did the Committee review the content of this

program during the preparation of the Special Report? If so, a) provide all documentation which was given to the committee during the preparation of the Special Report describing the program, or elements thereof, b) provide all written documentation of the review.

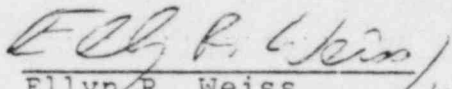
45. The Special Report States on p.33: "Instructor schools need to be established and all training personnel qualified in accordance with clearly stated criteria." Does the Committee believe that such schools have been established? If so, state what the Committee did during the preparation of the Special Report to review the curricula, methods of instruction and instructors at such schools. Provide all documentation given by GPU to the Committee during the preparation of the report and reviewed by the Committee in connection with such schools, identify the reviewer(s) and provide all documentation of the review(s).

46. With reference to the sentence quoted in #45, above, does the Committee believe that "clearly stated criteria" for qualification of training personnel have been established? Provide the criteria.

47. State what the Committee did during the preparation of the Special Report to evaluate the instructors at TMI-1. State a) which instructors were evaluated, b) who performed the evaluation, c) what the evaluation consisted of, d) whether

the instructors were observed or interviewed, e) if interviewed, provide the questions and answers, f) provide all written documentation of the evaluations.

By:

  
Ellyn R. Weiss  
General Counsel  
Union of Concerned Scientists

September 4, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

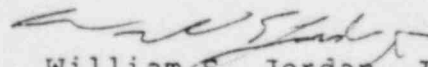
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
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Station, Unit No. 1)	)	
	)	

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CERTIFICATE OF SERVICE

I hereby certify that copies of UNION OF CONCERNED SCIENTISTS' MOTION TO REQUIRE THE NRC STAFF TO ANSWER UCS' FIRST SET OF INTERROGATORIES, UNION OF CONCERNED SCIENTISTS' FIRST REQUEST TO THE EXECUTIVE DIRECTOR FOR OPERATIONS FOR PRODUCTION OF DOCUMENTS, UNION OF CONCERNED SCIENTISTS' FIRST SET OF INTERROGATORIES TO NRC STAFF, UNION OF CONCERNED SCIENTISTS' SECOND SET OF INTERROGATORIES AND DOCUMENT REQUESTS TO GENERAL PUBLIC UTILITIES, were served this 4th day of September 1984, as follows: (1) By hand on all parties marked by an asterisk on the attached service list, and (2) by U.S. mail, first class postage prepaid, to the other parties on the attached service list.

  
William S. Jordan, III

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