

RELATED CORRESPONDENCE

September 12, 1984
'84 SEP 14 11:21

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
)	
(Three Mile Island Nuclear)	(Restart Remand on Management)
Station, Unit No. 1))	

LICENSEE'S ANSWERS TO INTERVENOR THREE MILE ISLAND ALERT'S
SECOND REQUEST FOR PRODUCTION TO GENERAL PUBLIC UTILITIES
(TRAINING)

Licensee General Public Utilities Nuclear Corporation (GPU Nuclear), pursuant to 10 C.F.R. § 2.741(d), hereby submits the following responses to "Intervenor Three Mile Island Alert's Second Request for Production of Documents to General Public Utilities." Documents will be made available in the discovery reading room located at the offices of Shaw, Pittman, Potts & Trowbridge, 1800 M Street, N.W., Washington, D.C. 20036.

DOCUMENTS REQUESTED

1. Notes, reports, memoranda or other documents generated in connection with interviews and/or contacts made by members of the Reconstituted OARP Review Committee to prepare, research and/or write the Special Report of the Reconstituted OARP Review Committee ("Special Report").

RESPONSE. Documents will be provided in the discovery reading room.

2. All documents related to inspections and/or visits of facilities made by members of the Reconstituted OARP Review Committee to prepare, research and/or write the Special Report.

RESPONSE. Documents will be provided in the discovery reading room.

3. All documents related to the extensive program for training and development of instructors referenced on page 20 of the Special Report, including but not limited to documents explaining the standardized method of instruction; written criteria for teaching instructors; and instructional materials.

RESPONSE. Documents will be provided in the discovery reading room.

4. All documents related to interview and/or classroom visits made by Dr. Long and Dr. Coe, referenced on page 22 of the Special Report, including but not limited to interviews, reports, memoranda, and personal notes.

RESPONSE. Documents will be provided in the discovery reading room.

5. The TMI document "Control of Examinations for Units 1 and 2", referenced on page 23 of the Special Report.

RESPONSE. Documents will be provided in the discovery reading room.

6. Memorandum dated January 27, 1984, from B.P. Leonard, Operator Training Manager to the Operator Training Section with six attachments, referenced on pages 23 to 24 of the Special Report.

RESPONSE. Documents will be provided in the discovery reading room.

7. All documents related to the GPU Nuclear Training Advisory Council, referenced on page 22 of the Special Report, including but not limited to all minutes of meetings; reports; recommendations or suggestions; materials prepared for meetings of the Advisory Council; and internal memoranda establishing or instructing the Advisory Council.

RESPONSE. Documents will be provided in the discovery reading room.

8. All documents related to implementing procedures for security of all categories of exams, referenced on pages 25 to 27 of the Special Report.

RESPONSE. Documents will be provided in the discovery reading room.

9. All documents related to the current curricula for operators at TMI-1, including but not limited to course materials, curricula, tests, instructions or directions, and quizzes.

RESPONSE. Documents will be provided in the discovery reading room.

10. All documents related to meetings between new training instructors and the Director of Training and Education, including but not limited to all written instructions or directions given the instructors; any memoranda written by the Director concerning such meetings, any personal notes of such meetings, and any recommendations, suggestions or changes made as a result of such meetings.

RESPONSE. Documents will be provided in the discovery reading room.

11. All documents related to the Vice President/Director of TMI-1's interviews with operators, including but not limited to the interview notes, memoranda or reports of the Director; notes, memoranda or minutes kept by the operators; reports issued as a result of such interviews; and all recommendations, suggestions or changes made as a result of such interviews.

RESPONSE. Documents will be provided in the discovery reading room.

12. Data-Design Laboratories' assessment report of selected TMI-1 training programs issued in 1982, referenced on page 29 of the Special Report.

RESPONSE. Document will be provided in the discovery reading room.

13. GPU's INPO accreditation review of its STA Training Program during 1984, referenced on page 29 of the Special Report.

OBJECTION. Licensee objects to Document Request 13 on the ground that the document requested is not relevant, nor is the information contained therein likely to lead to relevant information. The referenced INPO accreditation review of the STA Training Programs bears no relationship to Licensee's licensed operator training program because the STA Training Program is outside the scope of the licensed operator training program. Hence any documents concerning the STA Training Program would be irrelevant to the remanded training issue.

14. All documents related to the Management Analysis Corporation's decision analysis training course offered in 1980 or any modified programs offered after 1980, referenced on page 35 of the Special Report.

RESPONSE. Documents will be provided in the discovery reading room.

15. All documents related to guidance GPU provides for preparation of both oral and written examinations, including the matrix, referenced on page 36 of the Special Report.

RESPONSE. Documents will be provided in the discovery reading room.

16. The generic task analysis list prepared by INPO with GPU input, referenced on page 36 of the Special Report.

RESPONSE. Documents will be provided in the discovery reading room.

17. All instructor lesson plans used at any time at TMI-1 from 1979 to the present, referenced on page 45 of the Special Report.

RESPONSE & OBJECTION. Licensee will make all TMI-1 instructor lesson plans referenced on page 45 of the Special Report from March, 1981 to the present available in the discovery reading room. Licensee deems the production of those documents promulgated before that date to be objectionable because those documents are irrelevant and unduly burdensome to produce.

18. All documents related to the weekly meetings between shift supervisors and the Training Department, referenced on page 45 of the Special Report, including but not limited to meeting minutes, personal notes of the meetings, and written recommendations, suggestions or changes made as a result of those meetings.

RESPONSE. Documents will be provided in the discovery reading room.

19. All documents related to the audits, reviews or inspections conducted by management of all TMI training programs, referenced on page 45 of the Special Report, including but not limited to audits conducted by Dr. Long, Dr. Coe, and Mr. Hukill.

RESPONSE. Documents will be provided in the discovery reading room.

20. All INPO evaluation findings from 1979 to the present concerning TMI-1's training program and management interface or management control over the training program, including but not limited to the evaluation finding referenced on page 47 of the Special Report.

OBJECTION. Document Request 20 is unduly burdensome and, therefore, objectionable because Licensee has already provided

a copy of every INPO evaluation of TMI-1 to TMIA. Licensee delivered the first and second INPO evaluations of TMI-1, entitled "Three Mile Island Nuclear Power Station - Unit One" dated October 1981 and June 20, 1983. Licensee's provision of these documents is memorialized in its notifications to the Appeal Board dated November 3, 1981 and September 7, 1983 respectively. The third and final INPO evaluation of TMI-1 entitled "Follow-up on INPO Programs: CEO Workshop," dated September 1983 was also provided to TMIA as memorialized in the Appeal Board's notification from Licensee dated October 18, 1983.

21. The evaluations conducted by Mr. Kelly of the 1982 and 1983 written RO and SRO requalification examinations, answer keys and individual results on these written examinations, referenced on page 48 of the Special Report.

RESPONSE. There are no such documents, other than the Special Report.

22. All documents related to management's observation of crews during the ATOG simulatory training at the B&W simulator, referenced on page 52 of the Special Report.

RESPONSE. Documents will be provided in the discovery reading room.

23. A table of contents or listing of all sections of the Operations Plant Manual for operator training, referenced on page 54 of the Special Report.

RESPONSE. Documents will be provided in the discovery reading room.

24. The informal job and task analyses completed by GPU Nuclear Staff and the set constructed by INPO, both referenced on page 55 of the Special Report.

RESPONSE. Documents will be provided in the discovery reading room.

25. All TMI Self-Evaluation Reports from 1979 to the present, including but not limited to the Self-Evaluation Reports dated May 24, 1984, referenced on page 68 of the Special Report.

RESPONSE & OBJECTION. Licensee will make all TMI-1 Self-Evaluation Reports from March, 1981 to the present available to TMIA in the discovery reading room. Licensee deems the production of those documents promulgated before that date to be objectionable because those documents are irrelevant and unduly burdensome to produce.

26. For the period 1982 to the present, all documents related to communications between top management and the training program, including but not limited to documents related to the following, all referenced on pages 75 to 77 of the Special Report:

(a) formal interviews of Mr. Hukill with license holders and with each license candidate as part of the certification process, referenced on page 75 of the Special Report;

(b) written certifications by Operations and Training Management, including all evaluations of trainees' performance and attitude;

(c) "Management Interface" meetings held for, inter alia, training crews,

(d) Mr. Hukill's attendance at four hours of training classes per month;

(e) bi-weekly reports of activities including training for upper management and off-shift tours by management;

(f) Mr. Hukill's periodic meetings with operators as a group and Dr. Long's employees' meetings at the site;

(g) management and supervisory development training program, including seminars, including but not limited to seminar materials and curricula for the training program.

RESPONSE. Documents will be provided in the discovery reading room.

27. All documents related to or generated in connection with the following, referenced on pages 77 to 78 of the Special Report:

(a) Off-shift tours by management;

(b) simulatory training sessions attended by senior managers from Nuclear Assurance, Operations and Training;

(c) meetings between training and line functions to discuss training problems, including but not limited to minutes of such meetings, memoranda generated in connection with such meetings, and written recommendations, suggestions or changes resulting from such meetings;

(d) TMI-1 managers' meetings which Mr. Newton attends, insofar as they touch in any way on the training program, the qualifications of operators of training instructors, or management's interface and/or involvement with the training program.

RESPONSE. Documents will be provided in the discovery reading room.

28. A memorandum dated December 8, 1983, from P.R. Clark to S.L. Newton, referenced on page 78 of the Special Report.

RESPONSE. Document will be provided in the discovery reading room.

29. The letter dated October 9, 1981, from R.C. Arnold to GPU employees, referenced on page 79 of the Special Report.

RESPONSE. Document will be provided in the discovery reading room.

30. All documents listed on pages 80, 81, 85, 86 and 87, except items 2, 12, 14, 16, 17, 20, 24, and 25.

RESPONSE. Documents will be provided in the discovery reading room.

31. All documents related to Basic Energy Technology Associates, Inc.'s "A Report on a Review of Current and Projected Expenditures and Manpower Utilization for GPU Nuclear Corporation" (February 28, 1983) ("BETA Report"), including but not limited to all draft reports, all correspondence between BETA and GPU concerning the report; all instructions, directions or guidance given by GPU to BETA for preparation of the report; all GPU comments, remarks, criticisms or evaluations of the report; and all documents relating to actions taken by GPU in response to the BETA Report.

RESPONSE. Documents will be provided in the discovery reading room.

32. All documents related to "Priority Concerns of Licensed Nuclear Operators at TMI and Oyster Creek and Suggested Action Steps", Paul F. D'Arcy, Ph.D. and John R. Sauer, Ph.D., Rohrer, Hibler & Replogle, Inc. (March 15, 1983) ("RHR Report"), including but not limited to all draft reports, all correspondence between RHR and GPU concerning the report; all instructions, directions, or guidance given by GPU to RHR for preparation of the report; all GPU comments, remarks, criticisms or evaluations of the report; and all documents relating to actions taken by GPU in response to the RHR Report.

RESPONSE & OBJECTION. Documents will be provided in the discovery reading room, with the exception of those documents disclosure of which would constitute a breach of the confidential relationship between the operators and RHR. Such documents are privileged from disclosure. The individuals with knowledge of this privilege would be Dr. D'Arcy and Dr. Sauer of RHR.

33. All documents related to "An Assessment of the GPU Nuclear Corporation Organization and Senior Management and Its Competence to Operate TMI-1", Admiral H.G. Rickover, USN (November 19, 1983), including but not limited to all interview reports or notes; all drafts of the reports or sections of the report; all correspondence between Admiral Rickover and GPU concerning preparation of the report; all instructions, directions or guidance given by GPU to Admiral Rickover for preparation of the report; and all documents relating in any way to actions taken by GPU in response to the Rickover Report.

RESPONSE. Documents will be provided in the discovery reading room.

34. All documents GPU intends to introduce in this reopened management hearing on the training program issue.

RESPONSE. At this time, Licensee intends to introduce the Special Report of the Reconstituted OARP Review Committee dated June 12, 1984. This document will not be made available to TMIA as TMIA already possesses a copy of the Special Report.

35. Written criteria GPU has developed for training instructors and the NRC Staff's comments, evaluations, or conclusions about these criteria, referenced on page 68 of ALAB-772.

RESPONSE. Documents will be provided in the discovery reading room.

36. All documents identified in response to Interrogatory Nos. 2, 3, 5, 6, 7, 8, 20, 27, 35, 38, 39, 42, 50, 51, 53, 55, 56, 57, 58, 59, 61, 62, 72, 74, and 75 in Intervenor TMIA's Second Set of Interrogatories.

RESPONSE. Documents will be provided in the discovery reading room.

Respectfully submitted,

Deborah B. Bauser

Ernest L. Blake, Jr., P.C.
Deborah B. Bauser
Wilbert Washington, II

SHAW, PITTMAN, POTTS & TROWBRIDGE
1800 M Street, N.W., Suite 900
Washington, D.C. 20036
(202)822-1000

Counsel for Licensee

Dated: September 12, 1984