TMIA - 9/17/84

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

*84 SEP 19 A11:44

Before the Atomic Safety and Licensing Board

In the Matter of

METROPOLITAN EDISON COMPANY

(Three Mile Island Nuclear Station, Unit 1)

)

THREE MILE ISLAND ALERT'S RESPONSE TO LICENSEE'S THIRD SET OF INTERROGATORIES

Interrogatory T-31

Undersigned TMIA counsel provided information upon which TMIA relied in answering these interrogatories. Since TMIA counsel worked together to provide such information, it is impossible to determine the precise portion of each interrogatory to which each responded.

Interrogatory T-32

See TMIA response to Interrogatory No. T-2 in TMIA's Response to Licensee's First Set of Interrogatories.

Interrogatory T-33

TMIA has not had the opportunity to review the majority of documents produced by licensee in response to TMIA and UCS' discovery requests. At such time as TMIA has had sufficient time to review these documents, it will supplement its response.

Interrogatory T-34

PDR

TMIA believes that the issue before this Licensing Board is
whether GPU can provide adequate assurance that the licensed
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- 2 operators are capable of operating TMI-1 in normal and accident conditions in a manner to protect the public health and safety. GPU can provide this assurance in a number of ways, none of which GPU up to this point has adequately addressed: (1) Does the training program provide the operators with the appropriate training and skills and teach them the necessary concepts to operate TMI-1? (2) Does GPU management and the management of the training program possess sufficient integrity to instill a serious attitude and integrity in the operators? (3) Do the operators have a serious attitude toward training and possess sufficient integrity to operate TMI-1 safely? (4) Is licensee management structured to, and does it in fact, identify and correct in a timely manner problems and deficiencies in the training program, whether raised by management, operators or outside consultants? See generally, TMIA's Answer to Interrogatories T-4 and T-5, items 1-8, 11-13, and to Interrogatory T-7 in TMIA's Answers to Licensee's First Set of Interrogatories to TMIA. Interregatory T-35 See TMIA Response to Interrogatories T-4 and T-5, and T-7. Interrogatory No. 36 TMIA believes operators should have the following capabilities: (1) Education and/or training which permits them to respond to unexpected reactor conditions and transients; (2) The ability to understand concepts about how the plant

operates and the physics of plant operation such that the operators can safely operate TMI-1 in normal and accident conditions;

- (3) Integrity to ensure proper reporting of all information to corporate and operations management and to NRC and Commonwealth of Pennsylvania authorities; to ensure open and honest communication with management and the NRC; and to ensure adherence to all procedures and rules of licensee and NRC exams;
- (4) Identify problems and recommend improvements in the training program and plant procedures;
- (5) Ability to recognize weaknesses in their own training or skills;
- (6) Ability to police themselves during training exercises and GPU and NRC exams;
- (7) Ability to keep their training and skills current with new plant procedures and to maintain their skills at adequate level despite lack of experience on an operating reactor;
- (8) A recognition of the importance of additional NRC requirements imposed as a result of the TMI-2 accident and increased operating experience of commercial nuclear reactors.

See also TMIA's response to Interrogatory No. 7, in TMIA's Response to Licensee's First Set of Interrogatories to TMIA.

Respectfully submitted,

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