

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.

Interrogatory 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;

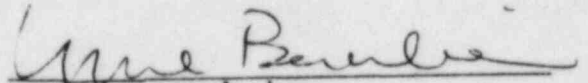
(7) Ability to keep their training and skills current with new plant procedures and to maintain their skills at adequate level despite lack of experience on an operating reactor;

(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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DATED: September 17, 1984

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