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WRITER'S DIRECT DIAL NUMBER  
September 18, 1984 (202) 822-1215

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Gary J. Edles, Chairman  
John H. Buck  
Christine N. Kohl  
Atomic Safety and Licensing Appeal Board  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

In the Matter of  
Metropolitan Edison Company  
(Three Mile Island Nuclear Station, Unit No. 1)  
Docket No. 50-289

Dear Chairman Edles and Administrative Judges Buck and Kohl:

In accordance with our practice of notifying the Appeal Board, the Licensing Board, and the parties of changed circumstances or new information on issues of interest, Licensee hereby provides a memorandum prepared by Mr. H. Hukill, Vice President & Director, TMI-1, dated September 17, 1984. The memorandum memorializes the actions taken by Mr. Hukill towards Mr. GG. As indicated in the memorandum, Mr. Hukill has discussed the matters of concern with Mr. GG; however, it was Mr. Hukill's judgment that a formal reprimand would be inappropriate.

Sincerely,  
*Deborah B. Bauser*  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

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**GPU Nuclear****Memorandum**DOCKETED  
USNRC  
'84 SEP 19 11:24

Subject: ALAB-772 RECOMMENDATION CONCERNING GG

Date: September 17, 1984

From: H. D. Hukill -  
Vice President & Director, TMI-1Location: TMI - Trailer #122  
File: Personnel - General  
9000-84-308

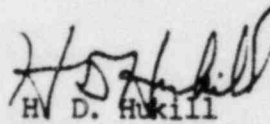
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I have given considerable thought regarding the ALAB's comment in footnote 42 of ALAB-772, dated May 24, 1984, that GG be issued a formal reprimand as was done for Shipman. I have reached the conclusion that a formal reprimand is not appropriate in this case based on the following considerations:

- GG continues to deny any involvement in cheating, whereas Shipman openly admitted his involvement.
- The evidence, although indicating that possible cooperation and cheating did take place, is inconclusive that GG himself, in fact, cheated.
- Both the Special Master's and the ASLB's reports recommended no sanctions against GG.
- Almost three years have passed since the initial investigations were conducted into the cheating matter. To issue a letter of reprimand, which is a much more severe form of discipline than many believe, would serve no useful purpose this long after the fact. Discipline should be applied as a deterrent, and no additional deterrent is needed in this case nor would it be appropriate after such a long period of time.
- Effective discipline is applied in a timely, fair, and consistent manner. The issuance of a formal reprimand to GG at this time would not meet this criteria.
- GG's performance as a Shift Foreman and Shift Supervisor has been adequate in all respects over the past three years. He is considered to be a competent, professional, and valuable member of the staff.
- Issuing a letter of reprimand to GG at this point in time, in my opinion, would indicate a lack of integrity on my part since I do not agree with this proposed action and consider the basic principles upon which it is based wrong from a leadership aspect. This action on my part would certainly and justifiably reduce my credibility with the personnel in my division, especially the licensed operators.

I did consider it appropriate, in view of the comments in ALAB-772, to discuss the matter with GG and ensure he fully understands the seriousness of the entire cheating episode and the importance of implementing the rules to prevent such events, both in training and in all matters pertaining to the operation and maintenance of the plant. I also wanted to assure myself that GG clearly understands the meaning and importance of honesty and integrity, and that these attributes are absolutely essential ingredients for the operation of a nuclear power plant. In his position as a supervisor they take on even more importance - not only must he demonstrate these qualities, but also he must ensure that the people working for him understand them and apply them in every facet of plant operation and maintenance.

I interviewed GG on August 29, 1984. We discussed the cheating event and the circumstances surrounding it in detail. We also discussed the Unit 2 leak rate issue (Hartman allegation) and the impact and seriousness of the actions and performance associated therewith on the operation of a nuclear plant. GG clearly acknowledges and accepts that the Company has established new rules, guidelines, and policies for the conduct of training and examinations associated therewith. GG indicated to me that he clearly understands, supports, and enforces absolute integrity and honesty, not only in training, but in all matters relating to plant operation and maintenance. He also understands the added responsibility he carries in this matter as a supervisor. In his words, the entire environment in which we work and train has improved dramatically.



H. D. Hukill

Vice President &amp; Director, TMI-1

HDH/pjl

cc: P. R. Clark - President  
GG