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UNITED STATES OF AMERICA '84
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

LICENSEE'S ANSWERS TO UNION OF CONCERNED
SCIENTISTS' THIRD SET OF INTERROGATORIES
AND DOCUMENT REQUESTS TO GENERAL PUBLIC UTILITIES

Licensee General Public Utilities Nuclear Corporation (GPU Nuclear), pursuant to 10 C.F.R. § 2.740b, hereby submits the following answers to "Union of Concerned Scientists' Third Set of Interrogatories and Document Requests to General Public Utilities." The provision of answers to these interrogatories is not to be deemed a representation that Licensee considers the information sought to be relevant to the issues to be heard in this remanded proceeding.

INTERROGATORIES

3-1. Recommendation K (p. 35) relates to INPO participation. State what INPO evaluations were actually reviewed by the committee and provide these.

ANSWER. See Special Report, Table A-2, reference 1, provided in response to TMIA (2d Set) Doc. Prod. 2.

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3-2. Has GPU's licensed operator training program been accredited by INPO?

ANSWER. No.

3-3. Recommendation M (p. 36) calls for the development of task analyses for control room operators. Did the Committee review any task analyses? If so, a) identify which task analyses were reviewed, b) identify the reviewer(s), c) state what the review(s) consisted of, d) provide all documentation of the reviews.

ANSWER. Dr. Uhrig was briefed generally by Mr. Leonard about the task analyses underway. Subsequently, all of the other Committee members were briefed by Mr. Gaines of GPUNC about the ongoing task analysis project for purposes of INPO accreditation. Drs. Gardner and Christensen also received a more detailed briefing by Mr. Gaines on GPUN's task analysis effort. The Committee did not review any particular task analyses.

3-4. Provide the task analyses referred to at p. 36 used by GPU for TMI-1.

ANSWER. The INPO task analyses will be provided in the document discovery room.

3-5. On page 42, the Committee states that its response to the issues addressed by ALAB-772 was limited by "time and information." Specify the limitations of "information" referred to. Did the Committee unsuccessfully seek any information? If so, specify the information sought and to whom the request was made.

ANSWER. See Table A-2 of Special Report. The Committee was able to obtain any information requested.

3-6. The Committee states that "most" TMI instructors "have or will hold either RO or SRO licenses...." How many licensed operator instructors are there and which licenses does each hold?

ANSWER. See Licensee's response to TMIA (2d Set)
Interrogatory 34.

3-7. On page 44 the Committee mentions the implementation of "several new programs", including "special B&W simulator training programs... to provide operators experience with the use of major TMI procedural changes, steam generator tube rupture emergency procedures, and other Licensee Event Report (LER) lessons learned."

a. Identify the programs referred to and provide the documentation describing their content.

ANSWER. The Committee was briefed by Mr. Leonard about the programs referred to in Licensee's response to TMIA's (2d Set) interrogatory 45.

b. State which such programs were reviewed as to their substance or content by the Committee during the preparation of the Special Report.

ANSWER. The programs were not reviewed first hand.

c. Identify the reviewer(s).

ANSWER. N/A.

d. Provide the material actually reviewed by the Committee relating to these programs.

ANSWER. N/A.

e. Identify which currently licensed operators have been trained through these new programs.

ANSWER. See attendance sheets provided in response to UCS (2d Set) Interrogatory 3(c).

3-8. On page 46, the Committee states that the TMI licensed operators' "competence has been evaluated periodically..." State what the Committee did during the preparation of the Special Report to itself evaluate the competence of any individual operators.

ANSWER. Nothing.

3-9. The Committee states on page 46 that its conclusion [that TMI-1 can be safely operated] "is further amplified and documented in the presentation of the ... results of the most recent NRC examination." State in precisely what manner the NRC exam results a) "amplify" and b) "document" the Committee's conclusion.

ANSWER. The NRC licensed operator exams are required by law before a person can operate a nuclear power plant. The Committee considers passing these exams a necessary but not sufficient requirement for operating the plant. A high pass rate on the NRC exams is an indication that the training program is achieving one of its objectives.

3-10. State precisely what the Committee considers to be the significance of the results of the NRC exams discussed at p. 46.

ANSWER. See response to Interrogatory 3-9.

3-11. To what extent, if any, did the Committee review the content, substance or validity of the NRC exams discussed at p. 46 during the preparation of the Special Report?

ANSWER. None.

3-13. If the committee did review the content, substance or validity of the NRC exams discussed at p. 46:

a. Identify and provide the exams reviewed

ANSWER. N/A.

b. Identify the reviewer(s)

ANSWER. N/A.

c. State what the review consisted of

ANSWER. N/A.

d. Provide all documentation of the review(s)

ANSWER. N/A.

3-14. The Committee cites as impressive the "high morale of the operators" (p. 46). Did the Committee review the responses of the TMI operators as described in the so-called "RHR Report?" If so, a) does the RHR Report cause the Committee any concern about the content, implementation or effectiveness of the GPU training program? b) specify these concerns, if any.

ANSWER. No.

3-15. On page 47, the Committee responds to the Appeal Board's comments regarding a Notice of Violation "citing numerous instances where licensee's personnel failed to follow proper operating procedures." The Committee notes that GPU's response claimed that "none of the violations were attributed to improper or inadequate training."

a. Is it the personal opinion of the members of the Committee that none of the violations were attributable to improper or inadequate training?

b. If the answer to a above is "yes," state how the Committee formed this opinion during the preparation of the Special Report e.g., what material was reviewed, who was interviewed.

c. What does the Committee believe caused the numerous instances of failure of licensees's personnel to follow operating procedures, if the causes did not include improper or inadequate training?

ANSWER/OBJECTION. Licensee objects to Interrogatory 3-15 because it is outside the scope of this proceeding, which is limited to the licensed operator training program. With respect to Interrogatory 3-15(b), references 2 and 17 of Table A-2 of the Special Report were reviewed by the Committee.

3-16. The Committee states at page 48 that "GPU Nuclear has conducted training on the examples cited by the ALAB."

a. Identify the "examples" referred to here and the specific training which the committee believes to have been directed to these "examples."

ANSWER. See Licensee's response to TMIA (2d Set) Interrogatory 45.

b. State whether the Committee reviewed the content of the training directed toward these examples in any way during the preparation of the Special Report.

ANSWER. No.

c. If the Committee did review the content of the training, provide the material reviewed and all documentation of the review.

ANSWER. N/A.

3-17. The Committee also states, on page 48: The ATOG Procedures...address most of them." State which ATOG procedures of the Committee believes to address each of the "examples cited by the ALAB."

ANSWER. See response to Interrogatory 3-16(a).

3-18. On page 48, the Committee discusses Frank Kelly's evaluation of the 1982 and 1983 requalification exams, answer keys and individual results. Provide all documentation of these evaluations, including but not limited to all reports containing and supporting Mr. Kelly's conclusions.

ANSWER. See response to UCS (2d Set) Interrogatory 14.

3-19. At pages 53-54, the Committee addresses the Appeal Boards concern regarding "undue emphasis on passing the examination, as opposed to learning how to operate the particular plant in question." State what the Committee itself did during the preparation of the Special Report to evaluate.

a) the consistency of the question and answer keys with actual current TMI-1 design.

ANSWER. Nothing.

b) the consistency of the current training information with actual current TMI-1 design.

ANSWER. The Committee was briefed on the Operations Plant Manual and when the various sections of the OPM would be finished. The Committee received assurances that the OPM is current and that procedures are in place to ensure that it will be maintained up to date.

3-20. If any evaluation(s) as described in 3-19 were conducted by the Committee

a) Describe the scope, nature and results of the evaluation(s)

ANSWER. See response to Interrogatory 3-19(b).

b) Provide all documentation of the evaluation(s)

ANSWER. There are no documents.

c) Identify the evaluator(s).

ANSWER. Dr. Uhrig.

3-21. On page 55, the Committee addresses the Appeal Board's question regarding whether the licensee and NRC examinations are "an effective way to measure an operator's ability to run the plant." State specifically what the Committee itself did during the preparation of the Special Report to evaluate the "format and content of the examinations." Identify the evaluator(s) and provide all written documentation of the evaluation(s).

ANSWER. See response to UCS (2d Set) Interrogatory 14. Mr. Kelly has extensive experience with the industry exam process; however, he did not review any non-TMI exams in his Committee work.

3-22. The Committee states at page 61 that GPU is one of only 3 U.S. utilities where operators are trained on both a BPTS and full-scale simulator. State how many U.S. utilities currently have replica simulators.

ANSWER. The Committee does not know how many U.S. utilities currently have replica simulators.

3-23. State what the Committee itself did during the preparation of the Special Report to evaluate the content or quality of the training given on the BPTS. Provide all documentation of any such evaluation(s).

ANSWER. See response to UCS (2d Set) Interrogatory 43.

3-24. State what the Committee itself did during the preparation of the Special Report to evaluate the content and quality of the training given in the B&W simulator. Provide all documentation of any such evaluation(s).

ANSWER. See response to UCS (2d Set) Interrogatory 42.

3-25. State what the Committee itself did during the preparation of the Special Report to evaluate the degree to which the B&W simulator is consistent with the actual current TMI-1 design.

ANSWER. See Response to UCS (2d Set) Interrogatory 42.

3-26. On page 65, the Committee notes "disagreements between the ASLB and the Special Master." State specifically the disagreements referred to herein.

ANSWER. This was a general observation by the Committee after reviewing the Milhollin Report and, particularly, the PID. The Committee did not generate a list of the disagreements.

3-27. On page 65, the Appeal Board's comments are reproduced regarding "subsequently acknowledged deficiencies in licensee's training program." State what the Committee believe to be the deficiencies in licensee's training program in the 1979-1981 time period. State how each deficiency has been corrected.

ANSWER. See Licensee responses to UCS (2d Set) Interrogatories 28 and 29.

3-28. The Committee states at page 66 that appropriate disciplinary action should be taken against individuals who have "engaged in, condoned, or encouraged cheating in any form." Identify all persons whom the Committee believes to have "engaged in, condoned, or encouraged cheating in any form."

ANSWER. See Licensee response to TMIA (2d Set) Interrogatory 51.

3-29. As to each person identified in 3-28, state whether, in the Committee's opinion, the person received appropriate disciplinary action and provide the basis for your answer.

ANSWER. The decision as to appropriate disciplinary action taken against specific individuals must remain the prerogative of management. The Committee did not evaluate the appropriateness of disciplinary action taken against individual operators.

3-30. Does the Committee believe that failure by a utility to take appropriate disciplinary action against persons who engaged in, condoned or encouraged cheating in the past could undermine the effectiveness of current training and/or

the respect of operators for the training program? Explain the basis for your opinion.

ANSWER. Yes, it could; however, on the basis of the information in the PID about disciplinary action taken against individuals, and recognizing the positive steps GPUN has taken to make clear to its employees that cheating will not be tolerated and to ensure that it will not reoccur, the Committee does not believe that GPUNC's actions have undermined the effectiveness of the current licensed operator training program.

3-31. The Committee states at page 67 that "GPU Nuclear may have been denied the services of some very talented people on the basis of little more than rumor, hearsay, or demeanor judgments." Identify specifically the people referred to herein.

OBJECTION. The individuals who cheated and the disciplinary action taken against them is outside the scope of this proceeding.

3-32. On page 72, the Appeal Board's comment is reproduced regarding Messrs. Kelly and Christensen's previous observations on the "pride and enthusiasm" found among employees in the training program. In Kelly and Christensen's opinions how does the "widespread disrespect" found by the ASLB and Special Master "bear on their previous assessment of the effectiveness of the training program." ALAB-772 at 66, emphasis added.

ANSWER. Mr. Kelly and Dr. Christensen doubt that there is widespread disrespect of the licensed operator training program by the licensed operators at TMI; however, they have not polled the operators.

3-33. The Committee states at p. 73 that there was "little opportunity to visit with operators or to monitor classes." State what the committee actually did during the preparation of the Special Report to a) visit with operators and b) monitor classes.

ANSWER. a) The Committee visited with the people listed in Appendix A;

b) The Committee did not monitor any licensed operator training classes.

3-34. On page 75, the Appeal Board's note regarding the Special Master's following comment is reproduced: "... with regard to the poor administration of licensee's examination,...if licensee was not aware of these conditions, its management was out of touch with the training program." Does the Committee agree that if GPU was not so aware, its management was out of touch with the training program? Explain the basis for your answer.

ANSWER. See response to TMIA (2d Set) Interrogatory 60. See also Special Report at 75-81.

3-35. Was the Committee aware during the preparation of its original testimony given in 1981 of the poor administration of licensee's examinations? Specify what the Committee was aware of during that time period in this regard.

ANSWER. No. The original OARP Report did not review the examination administration process.

3-36. The Committee states at page 83: "The bottom line as far as the Committee is concerned is that the GPU Nuclear training program produces qualified operators and is adequate to support the restart of TMI-1." Identify the specific facts which the Committee considered and believes to support the conclusion that the GPU training program actually "produces qualified operators."

ANSWER. The factual basis of the Committee's views are reflected throughout the entire Special Report.

3-37. To what extent does the Committee rely on the TMI operators' performance on NRC exams as support for the conclusion that the GPU training program actually "produces qualified operators."

ANSWER. See response to Interrogatory 3-9.

Respectfully submitted,

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