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RELATED CORRESPONDENCE

TMIA 9/24/84
DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 SEP 25 P3:02

Before the Atomic Safety and Licensing Board

In the Matter of)	OFFICE OF SECRETARY
)	DOCKETING SERVICE
METROPOLITAN EDISON COMPANY)	Docket No. 50-289 SP
)	(Restart - Management Phase)
(Three Mile Island Nuclear)	
Station, Unit No. 1))	

INTERVENOR THREE MILE ISLAND ALERT'S FOURTH SET
OF INTERROGATORIES TO GENERAL PUBLIC UTILITIES

To: GENERAL PUBLIC UTILITIES NUCLEAR CORPORATION

Intervenor Three Mile Island Alert ("TMIA"), pursuant to 10 C.F.R. 2.740b, hereby requests General Public Utilities Nuclear Corporation ("GPU" or "licensee") answer the following interrogatories by or before October 8, 1984, separately, fully, in writing and under oath.

These interrogatories are deemed to be continuing, and any additional information relating in any way to these interrogatories which GPU acquires subsequent to the date of answering them, up to and including the time of hearing, should be furnished to intervenor promptly after such information is acquired.

INSTRUCTIONS

A. All information is to be divulged which is in your possession or under your control, or is in the possession or under the control of your present or former management, officers, directors, executives, employees, staff, attorneys, or consultants, or their agents, representatives or attorneys.

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B. Where an individual interrogatory calls for an answer which involves more than one part, each part of the answer should be set out so that it is clear to which interrogatory it refers.

C. Where identification of a person is required, state the following: his or her name; his/her current address; if his/her current addresses are unknown, his/her last known home and business address; all position(s) he/she has held with GPU at any time; his/her home and business address at the time for which the interrogatory requests information; his/her current employer and position.

D. Where identification of a meeting, conversation, discussion or communication is required, the following shall be separately stated as to each such meeting, conversation, discussion or communication: the date; place; persons present or participating; the method of communication, whether oral or written; the identity of each participant; the substance of each person's participation; the substance or subject discussed or communicated; the purpose of the meeting or communication; the identity of any person who possesses information concerning such meeting, conversation, discussion or communication; the substance of any decision made at such meeting, discussion or conversation; any minutes, correspondence, notes, memoranda or other writing which resulted from or memorialized such meeting, discussion, conversation or communication, and the location of any such correspondence, notes, memoranda or other document.

F. Where identification of a document is required, state the following: its date; its exact title; the general subject matter of the document; the author and his/her affiliation, office or business, presently and at the time the document or correspondence was pre-

pared; the last known address of every person to whom a copy of the document was to be sent, other than the addressee described above; the name and address of all persons who now have the original and/or copies; the identification and location of the files where the original and each copy is kept in the regular course of business and the custodian thereof; and whether the document will be made available for inspection and copying, and the site of such voluntary production.

F. If GPU contends that the answer to any interrogatory is privileged, in whole or in part, or otherwise objects to any part of any interrogatory, state the reasons for each objection or grounds for exclusion, and identify each person having knowledge of the factual basis, if any, on which the privilege or other ground is asserted.

G. If an interrogatory could, at one time, have been answered by consulting documents which are no longer in existence, in answer to such interrogatory:

1. identify the information which was maintained;
2. identify all documents which contained such information;
3. state the time period during which such documents were maintained;
4. state the circumstances under which documents ceased to exist;
5. state the date when such documents ceased to exist;
6. identify all persons having knowledge of the circumstances under which such documents ceased to exist; and

7. identify all persons who have knowledge or had knowledge of the documents and their contents.

H. As used herein and unless the context otherwise required, the terms:

(i) "NRC" shall mean the Nuclear Regulatory Commission, its branches, departments, sections, offices, subdivisions, its present and former commissioners, administrators, officials, inspectors, investigators, staff, consultants, contractors, attorneys, employees, agents, representatives and accountants, or their agents, attorneys and representatives.

(ii) "General Public Utilities" or "GPU" shall mean General Public Utilities, any of its subsidiaries, including but not limited to GPU Nuclear Corporation and Metropolitan Edison Company, its or its subsidiaries' branches, divisions, departments, sections, affiliates, offices, present and former officers, directors, management, board of directors, employees, staff, officials, agents, consultants, attorneys, representatives or their attorneys, representatives and agents.

(iii) "Babcock and Wilcox" or "B&W" shall mean the Babcock & Wilcox Company, its subsidiaries, its or its subsidiaries' branches, divisions, departments, sections, affiliates, offices, and its and its subsidiaries' present and former officers, directors, management, board of directors, employees, officials, staff, agents, consultants, attorneys, representatives or their attorneys, representatives and agents.

(iv) "Document" shall mean every writing of every type and description, and every other instrument or device by which,

through which or in which information has been recorded and/or preserved, including but not limited to memoranda, including those reflecting meetings, discussions or conversations, notes, letters, drawings, files, graphs, charts, maps, photographs, deeds, agreements, contracts, handwritten notes, diaries, logs, ledgers, studies, data sheets, notebooks, books, appointment calendars, telephone bills, telephone messages, receipts, vouchers, minutes of meetings, pamphlets, computations, calculations, accounting(s), financial statements, voice recordings, computer printouts, computer discs and programs, and other data compilations, device or media on which or through which information of any type is transmitted, recorded or preserved. The term "document" also means every copy of a document when such copy is not an identical duplicate of the original.

(v) "Person" shall refer to any natural person, firm, partnership, joint venture, trust, corporation, holding company, or any other entity natural or legal, domestic or foreign.

(vi) "Communication" shall mean communication, discussion, conversation, contact, letter, memorandum, telephone call, telegram, message or direction, whether written or oral, and whether in person, by telephone or by mail.

INTERROGATORIES

1. The following interrogatories refer to the "Moore notes", which were attached to the September 17, 1980 Memorandum from Mr. Wallace to Mr. Arnold.

(a) Explain the circumstances under which Mr. Moore took all notes which appear as an attachment to the Arnold memorandum. Include in your explanation identification of the following:

(i) the purpose for his taking each portion of the notes;

(ii) Mr. Moore's location at the time he took each portion of the notes, including a description of which portions of the notes were taken at each place;

(iii) the persons to whom, on March 28, 1979, Mr. Moore communicated the information contained in his notes and the purpose for which he communicated that information to each such person. This subpart should be answered with regard to each portion of the notes, subdivided by time of notation, so that it is clearly understood what portion of the notes or the information contained in the notes were transferred to each person;

(iv) the action, if any, that any such person to whom the information was communicated, took on March 28, 1979 after receiving such information, insofar as it related to actions related to TMI-2 reactor or the ongoing accident;

(v) the time, purpose, and location at which Mr. Moore transmitted the information in his notes, specifically the information that in-core thermocouple temperatures had exceeded 2500 degrees, to Mr. Arnold, Mr. Wallace, or Mr. Dieckamp, if any of these three individuals were identified in response to subpart (iii) above;

(vi) whether on March 28 or up to 12:00 p.m. on March 29, 1979, the information that in-core thermocouple temperatures had exceeded 2500 degrees led to any discussion about the possible generation of hydrogen or the possibility of serious core damage;

(vii) whether or not any conclusion was reached on March 28 up until 12:00 p.m. on March 29, 1979, as to whether or not in-core thermocouple temperatures in excess of 2500 degrees indicated hydrogen generation or serious core damage;

(viii) if the answer to subpart (vii) is affirmative, whether or not any such conclusion was communicated to licensee GPU upper management, the NRC, or the Commonwealth of Pennsylvania authorities.

2. State whether any of the following individuals were aware on March 28, 1979 of in-core thermocouple temperatures at TMI-2 in excess of 2200 degrees on that date:

- (a) Robert Arnold;
- (b) E.G. Wallace;
- (c) Ron Williams;
- (d) Robert Keaton;
- (e) William Hirtz;
- (f) Rich or Richard Lentz;
- (g) T.G. (Gary) Eroughton.

3. Describe the activities of the following individuals on March 28, 1979, including identification of the following:

- (a) the location of the individual at all points during the day;
- (b) all communications the individual had at any time during the day, with licensee personnel, the NRC, or Commonwealth of Pennsylvania authorities;

(c) all information each individual possessed on March 28, 1979 concerning the following accident conditions or events: the possible generation or combustion of hydrogen, the actuation of containment sprays, any direction not to activate equipment in order not to create a spark or combustion of noncondensable gas; in-core thermocouple temperatures which indicated temperatures greater than 2200 degrees;

(d) conclusions or evaluations reached as a result of any information any individual possessed concerning any of the above-listed conditions of the reactor on March 28, 1979;

(e) all actions taken by any GPU personnel as a result of or in response to any conclusion or evaluation identified in subpart (d) above, and the person taking each such action; the time and date of taking each such action; and the purpose or reason for taking each such action;

(f) with respect to each action identified in response to subpart (e) above, identify each person who is aware that such action was taken in response to any conclusion identified in response to subpart (d) above;

These interrogatories are to be answered with respect to the following individuals:

- (a) Robert Arnold;
- (b) Herman Dieckamp;
- (c) E.G. Wallace
- (d) Ron Williams;
- (e) William Hirts;
- (f) Rich or Richard Lentz;
- (g) T.G. (Gary) Broughton

- (h) D.K. Cronenberger;
- (i) Mr. Capodanno;
- (j) Mr. Lehman;
- (k) Mr. Noonan.

4. Identify all conversations on March 28, 1979, between persons at the TMI site and licensee's offices in Parsippany concerning the conditions of the reactor or events occurring at the reactor site in which the following individuals participated, or of which the following individuals were aware:

- (a) Robert Arnold;
- (b) E.W. Wallace;
- (c) Robert Keaton;
- (d) James Moore;
- (e) Ron Williams;
- (f) Bill Hirts.

Include in your response identification of the following telephone conversations identified by Mr. Wallace in his deposition during the GPU vs. B&W litigation:

- (a) a conversation with Leland Rogers during the afternoon of March 28;
- (b) a conversation with an individual located at the Observation Center;
- (c) a conversation with an individual located in Harrisburg at 4:00 or 5:00 p.m., during which a recommendation was discussed to start a reactor coolant pump. (Mr. Wallace states he does not remember if the call was made to the Control Room, the Shift Supervisor's Office, or the Observation Center.)

5. What were the duties and responsibilities of each of the following persons called into Mr. Arnold's office in the early afternoon of March 28, 1979, to discuss the TMI accident and the conditions of the reactor, referenced in Mr. Wallace's B&W Deposition:

- (a) James Moore;
- (b) E. Wallace;
- (c) Ron Williams
- (d) Robert Keaton;
- (e) Bill Hirts.

6. Identify all persons who were routinely located at Parsippany, N.J., who were permitted access or entrance to the TMI-2 Control Room at any time during March 28, 1979, and all persons who granted any persons identified above that authority and/or permission to enter the TMI-2 control room:

Identify the purpose or reason each such person identified above was permitted access to the TMI-2 control room at that time.

7. Identify all documents which record or memorialize each communication and conversation identified in Interrogatory Nos. 3 and 4 above.

8. Identify with respect to the following individuals whether or not they were aware on March 28, 1979 that the occurrence of cladding temperatures in excess of 2200 degrees F. exceeded those specified in 10 CFP 50.46:

- (a) Gary Miller;
- (b) George Kunder;
- (c) Ivan Porter;

- (d) Michael Ross;
- (e) Theodore Illjes;
- (f) William Zewe;
- (g) Edward Frederick
- (h) Craig Faust;
- (i) Joseph Chwastyk;
- (j) Brian Mehler;
- (k) Robert Arnold;
- (l) James Moore;
- (m) E. Wallace;
- (n) Robert Keaton;
- (o) J.G. Herbein.

9. Identify which if any of the persons listed in Interrogatory No. 8 above were aware on March 28, 1979, or March 29, 1979, that in-core temperatures in excess of 2200 degrees F had been measured?

With regard to any individual identified above, state the time at which he so learned of the temperatures and the indicator from which he learned of the temperatures, i.e. computer printout, digital voltmeter or fluke thermometer.

10. Identify all persons listed in response to Interrogatory No. 9 above, who did not believe the accuracy or validity of the temperatures, and the reason(s) for such disbelief.

11. Identify all communications on March 28, 1979, among GPU personnel, or between GPU and B&W personnel, concerning the fact that in-core thermocouple readings of temperatures in excess of 2200 degrees F had been measured on March 28, 1979.

12. Identify all communications, discussions, conversations, or other contacts among GPU personnel, or between GPU and B&W personnel, related to whether in-core thermocouple readings of temperatures in excess of 2200 degrees F indicated that hydrogen had been generated.

13. Identify all communications, discussions, conversations, or other contacts among GPU personnel, or between GPU and B&W personnel, related to whether in-core thermocouple readings of temperatures in excess of 2200 degrees F indicated that the core had been damaged.

14. Describe any electrical malfunction of any kind which would appear on a wide-range or narrow-range pressure recorder of the same shape, wave length or character as the pressure spike which was recorded on a wide-range and narrow-range recorder at approximately 1:50 p.m. on March 28, 1979 at TMI-2.

15. Describe any electrical malfunction of any kind which could lead to the reactor building chart recordings of the pressure spike and the initiation of containment sprays which occurred almost simultaneously on March 28, 1979 at or about 1:50 p.m.

16. Identify all actions, including any communications, inquiries, investigations or other efforts, Mr. Dickkamp took prior to May 9, 1979, to determine whether any licensee or B&W personnel interpreted the pressure spike on March 28, 1979, to indicate core damage.

17. Identify all actions, including any communications, inquiries, investigations or other efforts Mr. Dieckamp took prior to May 9, 1979, to determine whether any licensee or B&W personnel interpreted initiation of containment sprays on March 28, 1979 to indicate core damage.

18. Identify all actions, including any communications, inquiries, investigations or other efforts Mr. Dieckamp took prior to May 9, 1979, to determine that no one had withheld any information about the pressure spike, the initiation of containment sprays, or reactor core damage.

19. Identify all actions, including any communications, inquiries, investigations or other efforts, Mr. Dieckamp took prior to May 9, 1979, to determine whether any GPU or B&W personnel believed on March 28, 1979 that the pressure pulse which was recorded indicated a real increase in pressure, or indicated the generation and/or combustion of hydrogen.

20. Identify all data which Mr. Lentz collect in the TMI-2 control room on March 28, 1979. Identify all information which Mr. Lentz subsequently communicated to licensee personnel in the Observation Center/Visitors' Center on March 28, 1979, and the reason or purpose for communicating such information. Specifically address whether Mr. Lentz communicated any of the information he had collected to the following persons:

- (a) James Moore;
- (b) E. Wallace;
- (c) Robert Arnold;
- (d) Robert Keaton.

State whether or not any person identified above transmitted any of this information to Mr. Dieckamp.

21. Identify all documents which recorded or memorialized the information which Mr. Lentz collected, including any data of records from the TMI-2 Control Room which he photocopied on March 28, 1979.

22. Identify the position and all duties and responsibilities of Richard Bensel on March 28, 1979. Identify all activities including any reporting activities of Mr. Bensel on March 28, 1979, concerning the TMI-2 accident.

Respectfully submitted,

Joanne Doroshow /LB
Joanne Doroshow
The Christic Institute
1324 North Capitol
Washington, D.C. 20002
(202) 797-8106

Lynne Bernabei
Lynne Bernabei
Government Accountability Project
1555 Connecticut Ave. N.W.
Washington, D.C. 20036
(202) 232-8550

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Attorneys for Three Mile Island
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