

September 28, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

METROPOLITAN EDISON COMPANY)

(Three Mile Island Nuclear)
Station, Unit No. 1))

) Docket No. 50-289 SP

) (Restart - Management Phase

UNION OF CONCERNED SCIENTISTS SUPPLEMENTAL
RESPONSE TO FIRST SET OF INTERROGATORIES

The following answers, by agreement memorialized in a letter from Deborah Bauser to Ellyn Weiss, Sept. 26, 1984, supplement UCS's answers to Licensee's First Set of Interrogatories and First Request for Production of Documents to UCS. In exchange for these answers, GPU agreed to withdraw its September 14, 1984 motion to compel against UCS.

U-4, U-5

The procedures which currently form the basis for UCS' concern about training keeping pace with changing plant procedures are those referred to in UCS's first document production request to GPU, #3.

U-6

In UCS's previous answer to interrogatory U-6, UCS stated :
"...we seriously doubt the GPU training programs can be

effectively administered by persons who bear responsibility for the conditions which caused widespread disdain for the training program, persons who bear responsibility for GPU's response to the cheating episodes - a response which UCS considers egregiously inadequate, persons who do not acknowledge or understand that the training program revealed by the evidence in the cheating hearings was a failure."

UCS believes that the individuals falling within this category include Mssrs. Long, Newton, Husted; Hukill, R. Wilson (responsibility for response to cheating). While we are not yet in possession of sufficient information to know who is responsible for deciding to retain and promote these people, we assume that Mssrs. Clark and Hukill must approve such decisions.

U-17

The following pages of the Report of the Sepcial Master support UCS's position on Interrogatory U-16: 15 NRC 928; 931-2 (O+H, highly respected supervisors, cheated and showed lack of respect for responsibilities); 934-943 (nature of exam questions, and answer keys, ineffectiveness of training, role of memorization); 946-8 (weekly quizzes); 959-961 (Husted attitude); 977-988 (nature of NRC exams and answer keys, NRC dependence on GPU, inconsistencies between training and plant design); 1006-1013 (requalification and make-up exams, disrespect for training program; 1014-1020 (GPU training and testing program); 1020-1022 (certification of candidates); 1024-1034, 1054-6 (content of NRC exam); 1045 (Husted attitude);

1049-1051, 1053-4 (negative attitude to training); 1051-3 (GPU response to cheating).

The pages of the ASLB decision are : 16 NRC 296 (GPU test procedures, operators' disrespect for training and testing); 298-9 (content of NRC exam); 300 (failures of Nuclear Assurance Division); 308 (GPU response to G+H); 318-320 (Husted attitude); 325-333 (NRC exam dependence on GPU); 344-355 (requalification and make-up exams, certification); 355-365 (GPU tests, particularly weekly quizzes, role of memorization, deficiencies in quality of instruction, grading); 365-6 (certification); 367-373 (content of NRC exam, dependence of NRC exam of GPU); 379-381 (GPU failure to assure quality of instruction and examination process).

U-19

See UCS's answer to Licensee's second set of interrogations,

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U-24

UCS has identified the following additional concerns from statements in the RHR report:

1. Operators are dissatisfied with the training for the requalification exams. They feel there is insufficient time devoted to this and that the handling of the repeat courses is boring and often produces a "turned off" attitude. RHR Report, March 15, 1983, unnumbered page under heading "Issues of Training."
2. Only eight out of ten operators felt that they were better

prepared for an emergency as a result of the changes since the TMI-2 accident. Id., Unnumbered page under heading "II Explanatory Material."

3. One-quarter of the operators agreed that operators tended to underestimate the potential danger. Id., next unnumbered page.

4. There is a strong agreement that the procedural complexity is a hazard to safety. Operators agree that they suffer from information overload. Id., 2 pages after.

5. There is considerable feeling that emergency procedures need to be simplified. Id. next page.

6. It was felt that procedures need to be written by individuals familiar with operations. Id.

7. The operators feel that what is taught in training is different than what they experience in the plant. Id., 4 pages after.

8. Operators complain that not enough time is devoted to requalification training, and training is often cancelled at the last moment. Id.

9. There appear to be antagonisms between requalification trainers and licensed operators. Id.

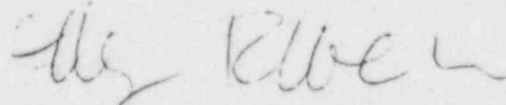
10. The present training program is geared to the needs of the Ex-Navy personnel and out of phase with the need of the operator who comes up through the plant; those who come up from the plant feel left behind and at a disadvantage. Id.

11. Many operators have said that while the training department has grown in size, the staff assigned to operator training has

shrunk. They believe the training department is not staffed to handle the range of operator needs. Id.

12. Operators complain about the lack of inter-departmental cooperation. They are greatly dissatisfied with Training policies. Id., 3 pages after.

Submitted by:



Ellyn R. Weiss
General Counsel
Union of Concerned Scientists

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CERTIFICATE OF SERVICE

I hereby certify that copies of "UNION OF CONCERNED SCIENTISTS' RESPONSE TO LICENSEE'S SECOND SET OF INTERROGATORIES TO UCS" and "UNION OF CONCERNED SCIENTISTS SUPPLEMENTAL RESPONSE TO FIRST SET OF INTERROGATORIES" have been served on the following persons by deposit in the United States Mail, first class postage prepaid, this 28th day of September 1984.

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