

RELATED CORRESPONDENCE

TMIA 10/1/84  
DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board<sup>84</sup> OCT -4 A10:39

In the Matter of	)	
	)	
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 FIFTH 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.

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.

(viii) "TMI site" shall mean all Met-Ed and/or licensee facilities located in Londonderry Township, Pennsylvania, including the TMI-1 and TMI-2 facilities, all other facilities on Three Mile Island, the Observation or Visitors' Center, and homes owned by licensee.

INTERROGATORIES

1. With respect to Three Mile Island Alert's (TMIA) First Set of Interrogatories and First Request for Production; TMIA's Second Set of Interrogatories and Second Request for Production; and TMIA's Third Set of Interrogatories and Third Request for Production, supplement any response that is no longer complete, current or accurate.

2. With respect to the time period from at or about 2:00 p.m. to at or about 8:00 p.m. on March 28, 1979, state the following regarding Mr. Dieckamp's actions or activities on that date:

(a) describe all Mr. Dieckamp's actions or activities from the time he met with Mr. Herbein, Mr. Miller and Mr. Kunder on the steps of the State Capitol in Harrisburg, Pennsylvania until he returned to his home in New Jersey. With respect to all such actions or activities identify the following:

(i) the precise time he arrived at each location;

(ii) the precise method of transportation he used to move from one location to another, i.e., by company car, airplane, private care, taxi, etc.

(iii) the person(s) who accompanied him for any portion of the trip or time he moved from one location to the next;

(iv) any communications between or among the persons who accompanied Mr. Dieckamp, whether or not Mr. Dieckamp participated in any such communications;

(v) any communications between Mr. Dieckamp and Mr. Arnold during this period of time;

(vi) any communications between Mr. Dieckamp and Mr. Creitz during this period of time;

(vii) the precise method of any communication identified in subparts (v) and (vi) above, that is, whether by telephone, radio, walkie-talkie, wire, or other means of communication;

(viii) any documents which record or otherwise refer to or mention Mr. Dieckamp's activities or travel, including but not limited to airplane logs; telephone or itinerary records; calendars; travel arrangements; chauffeur logs; and telephone records.

This interrogatory is to be answered by all individuals within GPU with relevant information about Mr. Dieckamp's actions and activities on March 28, 1979.

3. Identify all communications between Mr. Arnold and Mr. Dieckamp on March 28, 1979 and between Mr. Creitz and Mr. Dieckamp on March 28, 1979. The basis for this question is, that Mr. Herbein testified in his deposition on September 28, 1979, that he believes that both Mr. Arnold and Mr. Creitz communicated with Mr. Dieckamp on March 28, 1979 about the TMI-2 Accident, although he could not remember or did not know the specific issues or items discussed during those conversations.

4. Identify all communications between Mr. Arnold and any of the following individuals on March 28, 1979:

- (a) T. Gary Broughton
- (b) J. P. Moore
- (c) J. Abramovici
- (d) G. Lehmann
- (e) R. Lentz

5. Identify all communications on March 28, 1979, between the TMI-1 Control Room, the TMI-2 Control Room, or the Observation Center, on the one hand, and General Public Utilities Service

Corporation offices or GPUSC's Mountain Lakes office, on the other hand. Include in your identification communications between or among the following individuals:

- (a) R. Arnold;
- (b) R. Wilson;
- (c) E. G. Wallace;
- (d) William Hirts;
- (e) Richard Lentz;
- (f) T. Gary Broughton;
- (g) D. Cronenberger;
- (h) Mr. Capodanno;
- (i) J. Moore;
- (j) R. Keaton;
- (k) G. Lehmann;
- (l) J. Abramovici.
- (m) L. Rogers;
- (n) S. Maingi;
- (o) G. Schaedel;
- (p) I. Porter;
- (q) J. Flint;
- (r) U. Putman;
- (s) R. W. Winks;
- (t) J. J. Kelly;
- (u) T. Twilley;
- (v) E. Yuchrein;
- (w) D. Uhl.

6. Identify all persons who provided Mr. Moore with the information which he wrote in his notes for March 28, 1979, at



5:00 p.m.

7. Identify all means, methods or lines of communication which existed between TMI-1, TMI-2 or the Observation Center and Mountain Lakes, GPU Service Corporation ("GPUSC"), on March 28, 1979.

Identify the function of all persons who at any time from March 28, 1979 to March 30, 1979 were located at GPUSC, Parsippany, or GPUSC at Mountain Lakes, with regard to the ongoing TMI Accident. Specifically establish the function, duties and responsibilities, and actions and activities of the following persons on March 28, 1979:

- (a) D. Cronenberger;
- (b) R. Keaten;
- (c) N. Trikouros;
- (d) D. Slear;
- (e) T. Dempsey;
- (f) R. Heward;
- (g) B. McCutcheon;
- (h) J. Barton;
- (i) M. Kostrey;
- (j) B. Reinmann;
- (k) L. Rochino;
- (l) T. Lu;
- (m) L. Garibian;
- (n) T. Golian;
- (o) L. Zanis;
- (p) J. Langenbach;
- (q) L. Lanese;
- (r) J. DeVine;

- (s) W. Schmauss;
- (t) G. Staudt;
- (u) R. Chisholm;
- (v) S. Levin;
- (w) B. Elan;
- (x) R. Cutler;
- (y) G. Braulke;
- (z) F. G. Maus;
- (aa) I. Feinberg;
- (bb) S. Deshmukh;
- (cc) J. Daniel;
- (dd) G. Steuerwald;
- (ee) J. Thorpe;
- (ff) R. Arnold;
- (gg) R. Wilson;
- (hh) E. G. Wallace;
- (ii) W. Lowe;
- (jj) T. Fischer;
- (kk) M. Morrell;
- (ll) D. Reppert;
- (mm) R. McGoey.

8. Identify all communications between Mr. Arnold and B&W on March 28, 1979, concerning the TMI-2 Accident.

9. Identify all information available to Mr. Arnold at the time he suggested, recommended, urged, ordered and/or directed that site personnel take the following actions during the afternoon of March 28, 1979.

- (a) repressurize the TMI-2 reactor;

- (b) start HPI or increase HPI;
- (c) start a reactor coolant pump.

Identify all persons with whom Mr. Arnold consulted in making these suggestions, recommendations, orders or directions identified above. Specifically state whether he consulted with the following individuals in making such recommendations, orders or directions;

- (a) J. Herbein;
- (b) H. Dieckamp;
- (c) W. Creitz;
- (d) any B&W personnel.

With respect to any person identified above with whom Mr. Arnold consulted state the the following:

(a) the information he/she possessed concerning the conditions of the reactor and/or the strategies being used or considered to bring the reactor to a stable condition;

(b) the persons he/she had previously consulted regarding the condition of the reactor;

(c) all data he/she had reviewed or of which he/she had been informed prior to consultation with Mr. Arnold.

10. Mr. Chwastyk testified that awareness of the pressure spike and its implications led Mr. Miller to change to a repressurization strategy shortly after 1:50 p.m. on March 28, 1979.

With regard to the repressurization strategy implemented in the afternoon of March 28, 1979, identify the following:

(a) all actions taken in the course of this repressurization strategy and the reason for taking each such action;

(b) the precise time each such action was taken and the reason

for taking each such action at that time;

(c) the person(s) who ordered or directed each such action be taken, and the person(s) who implemented each such action;

(d) the person(s) consulted in the course of determining to implement this strategy and/or the particular actions taken in the course of implementing the strategy.

11. Several witnesses during depositions taken during the week of September 24, 1984 have testified that operators and other licensee personnel located in the Unit 2 Control Room during the first day of the Accident were debriefed during March 28, 1979 and March 29, 1979.

With respect to such debriefings and/or interviews with operators or other licensee personnel from the TMI-2 Control Room during March 28, 1979, identify the following:

(a) all persons who conducted the interviews or debriefings;

(b) all persons who authorized or directed the interviews or debriefings;

(c) the purpose for the debriefings and/or interviews;

(d) all persons who were debriefed or interviewed on March 28, 1979 or March 29, 1979;

(e) all persons to whom the information obtained during these debriefings and/or interviews was transmitted;

(f) the exact time and date the information obtained during these debriefings and/or interviews were transmitted to the persons identified above and the precise information transferred at these times;

(g) all interviews or debriefings which could have led to the notes taken by J. Moore at or about 5:00 p.m. on March 28,

1979, which had been previously entered into the deposition record as Moore Exhibit 1;

(h) all documents which record, memorialize, mention, or otherwise refer to these debriefings or interviews.

12. Identify all persons who directed that Mr. Moore be prevented access to Three Mile Island (TMI-1 and TMI-2) on March 28, 1979, when he originally arrived at the TMI site. Identify all persons who directed that any other GPU Service Corporation personnel be denied access to the TMI-2 Control Room on March 28, 1979, including but not limited to any of the group of GPUSC engineers Mr. Herbein has testified Mr. Arnold sent to the TMI site on March 28, 1979.

13. State licensee's position as to the following:

(a) Should the pressure spike indicating a real increase in pressure to at least 28 psi have been reported to licensee management, GPUSC management, the NRC or the Commonwealth of Pennsylvania on March 28, 1979?

(b) Should the initiation of containment sprays have been reported to licensee management, GPUSC management, the NRC or the Commonwealth of Pennsylvania on March 28, 1979?

(c) Should the fact of in-core thermocouple readings in excess of 2200 degrees have been reported to licensee management, GPUSC management, the NRC or the Commonwealth of Pennsylvania on March 28, 1979?

Answer the above questions considering two alternate theories:

(a) Control room personnel with knowledge of the condition and/or fact believed the reading or indicators to be accurate and

reliable;

(b) Control room personnel with knowledge of the condition and/or fact did not believe the reading or indicator to be accurate and reliable;

14. Identify all person(s) who briefed Mr. Herbein and Mr. Dieckamp on TMI-2 conditions on March 28 through March 29, 1979, and on the Accident sequence of events prior to the presentations made by Mr. Herbein and Mr. Dieckamp to the Congressional delegation led by Senator Gary Hart to the TMI site on March 29, 1979.

Identify the information, data or materials prepared and/or provided to Mr. Dieckamp and Mr. Herbein to aid them in their presentations made on March 29, 1979.

State whether Mr. Herbein or Mr. Dieckamp were informed of the following in preparation for their presentations to the Congressional delegation on March 29, 1979:

(a) in-core temperatures in excess of 2200 degrees had been recorded at TMI-2 on March 28, 1979;

(b) a pressure spike had been recorded at approximately 1:50 p.m. on March 28, 1979;

(c) containment sprays had been actuated at approximately 1:50 p.m. on March 28, 1979, indicating a real increase in pressure to at least 28 psi;

(d) an explosion, hydrogen generation, hydrogen burn or hydrogen explosion had occurred or was suspected to have occurred on March 28, 1979.

15. State all reasons that Mr. Herbein was not directed to station himself at TMI-2 during March 28, 1979, given the fact

that he was the highest ranking Met-Ed official at the TMI site on that date.

State all reasons that Mr. Herbein chose not to locate and/or station himself at TMI-2 during March 28, 1979, and instead chose to work from the Observation Center.

16. Identify all home and business phone numbers for the following licensee personnel on March 28, 1979:

- (a) Herman Dieckamp;
- (b) Robert Arnold;
- (c) Walter Creitz;
- (d) Richard Wilson;
- (e) E. Wallace;
- (f) Robert Keaton;
- (g) D. Cronenberger.

Respectfully submitted,

Joanne Doroshon / JB  
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.  
Suite 202  
Washington, D.C. 20036  
(202) 232-8550

DATED: October 1, 1984

Attorneys for Three Mile Island  
Alert