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RELATED CORRESPONDENCE

September 10, 1984

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

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

TO: GENERAL PUBLIC UTILITIES NUCLEAR CORPORATION

Pursuant to 10 C.F.R. 2.740(b) and 2.741, the Union of Concerned Scientists hereby requests General Public Utilities Nuclear Corporation ("GPU" or "licensee") to answer the following interrogatories separately, fully, in writing and under oath, and to provide access to the requested documents. All persons who answered or assisted in answering the interrogatories should be identified and the answers to which (s)he contibuted indicated.

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

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The instructions and definitions to be used in answering these interrogatories and document requests are the same as those stated in Union of Concerned Scientists First Set of Interrogatories to General Public Utilities and First Request to General Public Utilities for Production of Documents.

The following questions relate to the Special Report of the Reconstituted OARP Review Committee (hereafter "Special Report"); June 12, 1984. Unless otherwise indicated, page references are to that document.

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

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

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.

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

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.

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?

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.

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

c. Identify the reviewer(s).

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

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

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.

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.

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

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?

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
- b. Identify the reviewer(s)
- c. State what the review consisted of
- d. Provide all documentation of the review(s)

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.

3-15. On page 47, the Committee responds to the Appeal Board's comments regarding a Notice of Violation "citing numerous instances where licensees' 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' personnel to follow operating procedures, if the causes did not include improper or inadequate training?

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."

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.

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

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."

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.

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.

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

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)

b) Provide all documentation of the evaluation(s)

c) Identify the evaluator(s).

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).

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.

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).

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).

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.

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

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 believes to be the deficiencies in licensee's training program in the 1979-1981 time period. State how each deficiency has been corrected.

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."

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.

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.

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.

3-32. On page 72, the Appeal Board's comment is reproduced regarding Mssrs. Kelly and Christensen's previous observations on the "pride and enthusiasm" found among employees in the training program. In Kelly and Christensens' 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.

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.

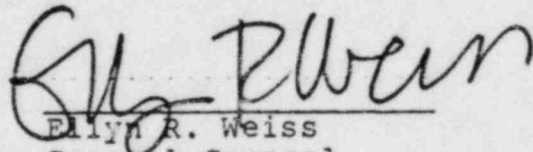
3-34. On page 75, the Appeal Board's note regarding the Special Master's following comment is reproduced: "... with regard to the poor administration of licensee's examinations,...if licensee was not aware of these conditions, its management was out of touch with the training program." Does the Committee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

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.

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."

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."

By:



Eilyn 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' THIRD SET OF INTERROGATORIES AND DOCUMENT REQUESTS TO GENERAL PUBLIC UTILITIES was served this 10th day of September 1984, as follows: (1) by hand on all parties marked by an asterisk on the attached service list, and (2) by U.S. mail, first class postage prepaid, to the other parties on the attached service list.

  
William S. Jordan, III

UNITED STATES OF AMERICA  
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