



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

1983

MEMORANDUM FOR: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

FROM: Lawrence P. Crocker, Section Leader
Licensee Qualifications Branch
Division of Human Factors Safety

SUBJECT: REPLACEMENT OF PERSONNEL WITHIN THE GPUN AND TMI-1
ORGANIZATIONS

A memorandum from the EDO to the Commissioners dated May 19, 1983, itemized five remaining open issues which precluded the staff from drawing a conclusion regarding management integrity as related to TMI-1 restart. Of these five issues, three involve questions regarding the integrity of certain individuals within the GPUN and TMI-1 organizations. A subsequent memorandum from the EDO to the Commissioners dated June 7, 1983, recommended that matters related to individuals whose integrity has been questioned be separated from the issues relating to the corporate institution such that final resolution of questions related to individuals could be pursued on a schedule separate from the TMI-1 restart decision schedule.

In a letter dated June 10, 1983, from Mr. Herman Dieckamp to Chairman Palladino, GPU proposed a means for separating questions relating to individuals from the larger question of GPU corporate integrity. Mr. Dieckamp proposed:

1. Reassigning personnel as necessary such that no operator previously licensed on TMI-2 will be allowed to operate TMI-1 (except for the TMI-1 manager of operations).
2. Providing full time, on shift quality assurance coverage by degreed engineers. (This is in addition to the Shift Technical Advisor.)
3. Reassigning all personnel who had pre-accident assignments as Met-Ed exempt (non-bargaining unit) employees at TMI-1 or TMI-2 from positions where they provide overview assessment, analysis or audit of plant activities. Specifically, this includes personnel in the functions of:
 - a. General Office Review Board
 - b. Independent On-Site Safety Group
 - c. Shift Technical Advisors
 - d. QA Audit
 - e. QA and QC Site Staff
 - f. Licensing

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- g. Radiation Control
 - h. Emergency Preparedness
4. Reallocation of priorities and assignments within the Office of the President, GPUN, such that TMI-1 will report primarily to the Executive Vice President.

In a letter to Governor Thornburgh, also dated June 10, 1983, Mr. Dieckamp specifically committed to not use as TMI-1 operators the two individuals still with the corporation to whom the Commonwealth of Pennsylvania had objected.

On June 13, 1983, Mr. Clark, the Executive Vice President of GPUN briefed a joint NRR-Region I inspection team on what the proposals would mean in terms of personnel reassignments and job transfers. A similar briefing for NRR and other parties was held in Bethesda on June 21, 1983.

In effect, Mr. Dieckamp's proposals would eliminate from contention related to TMI-1 restart all those individuals who have been identified as having been somehow involved with the events preceding or connected with the accident at TMI-2. Unfortunately, the proposed plan would also affect many capable individuals who apparently had no involvement with the events at TMI-2 or the cheating incidents. However, since they were employed by Met-Ed on site prior to the accident, they now are to be tainted as though they also were involved.

It is quite apparent that Mr. Dieckamp was responding to either a stated or implied suggestion from the NRC that such actions on the part of GPU would improve the chances for a decision on TMI-1 restart. The corporation would no longer be held hostage to final resolution of every allegation or suggestion of impropriety that has been made or might be made against any employee. Release on June 23, 1983, of Commissioner Gilinsky's June 22, 1983, memorandum attaching his February 24, 1983, draft views on TMI-1 restart made obvious the genesis of the suggestion.

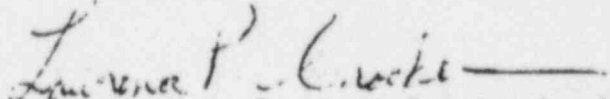
I fully support, and have long advocated, the separation of the TMI-1 restart decision from questions regarding the integrity of individual employees. However, I cannot and will not support an action which tars all long-standing TMI-1 and TMI-2 employees with the brush of integrity imperfections. To do so, in my view, is an affront both to the individuals involved and to basic concepts of fair play. Further, it is apparent from Commissioner Gilinsky's memorandum that even this large sacrifice of people would not be sufficient. He demands also the President of the Corporation and the Chairman of the Board.

As a result, recognizing the context in which the GPU offer was made, I feel that it should be carefully evaluated and accepted only in part, as follows:

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1. The name of each individual identified according to the criteria proposed by GPU should be checked against a list of names of individuals identified as suspect during the investigations and hearings related to the accident and to TMI-1 restart. Of necessity, at this time, such a check would also have to include a comparison by OI, DOJ and any others who may have information that is not generally available.
2. An individual whose name does not appear on a list of individuals known to NRR, or to the other offices or agencies, as being suspect should be automatically exempted from consideration for forced reassignment in accordance with the GPU proposal.
3. For an individual whose name does appear on some list as being somehow involved in the pre-accident TMI-2 alleged improprieties or in the cheating incident, or named in the subsequent allegations, further evaluation should be accomplished to determine the nature of the involvement. Mere mention by an intervenor or mention in an allegation should not be sufficient grounds for requiring transfer. There must be genuine doubts regarding the individual's integrity. Anyone for whom such doubts do not exist should be exempted from consideration for transfer.
4. For those individuals who are still under investigation, a temporary transfer from a sensitive position pending the outcome of the investigation probably is in order, although, as pointed out in Inspection Report 50-289/83-10, sufficient procedures and checks are in place to virtually preclude any concerns regarding the safety of plant operations even if these individuals were to remain in their present assignments.

To do more than the above is, in my view, counter both to plant safety and to basic ethical considerations. I cannot accept the premise that human sacrifice is necessary to either atone for the TMI-2 accident or to appease the gods of nuclear safety in preparation for TMI-1 restart.


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