

NUCLEAR REGULATORY

OFFICE OF INVESTIGATIONS FIELD OFFICE

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OFFICE OF INVESTIGATION
HEADQUARTERS

MEMORANDUM FOR: Ben B. Hayes, Director
Office of Investigations

THRU: William Ward, Director *W/W 8/24/83*
Division of Field Operations, Office of Investigations

FROM: R. Keith Christopher, Director
Office of Investigations Field Office, Region I

SUBJECT: CONSIDERATION OF THE GPUN MANAGEMENT COMPETENCE ISSUE AS IT
RELATES TO OI INVESTIGATION 1-83-010 (THREE MILE ISLAND
UNIT 2 (TMI-2)/ALLEGED FALSIFICATION OF REACTOR COOLANT
SYSTEM LEAK RATE TESTS)

The purpose of this memorandum is to submit for your consideration my opinion of certain additional actions I feel the NRC should consider as it relates to the subject matter of this memorandum.

The ongoing investigation by the Office of Investigations as well as the numerous other investigations by the Department of Justice, NRC Region I, the Office of Nuclear Reactor Regulation, and the licensee, involves an in-depth examination of the licensee's performance of Reactor Coolant System Leak Rate Tests at both TMI Unit 1 and Unit 2. The results of these activities will certainly have a direct bearing on the Commission's decision regarding the restart of TMI-1.

I recommend that the Office of Investigations make a request to the appropriate authority to examine the performance of leak rate tests at other randomly selected plants (at least two) similar in design to TMI Units 1 and 2 so that a proper comparison can be made and similar problems pertaining to leak rate tests can be identified. The objective of the examination would be to determine whether or not leak rate test problems at TMI was unique to TMI or if it was a generic problem throughout the industry. If such an examination shows that the problem was unique to TMI, the assessment of GPUN's management competence in relation to the management competence of comparable facilities might be facilitated.

This comparative base will only serve to enhance the Commission's ability to make a proper decision regarding the restart of TMI-1.