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November 26, 1984 (202) 822-1215

Administrative Judges Ivan W. Smith, Chairman Sheldon J. Wolfe Gustave A. Linenberger, Jr. Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> In the Matter of Metropolitan Edison Company (Three Mile Island Nuclear Station, Unit No. 1) Docket No. 50-289 (Restart - Remand)

Dear Chairman Smith and Administrative Judges Wolfe and Linenberger:

On November 15, 1984, the NRC Staff prefiled its testimony on the remanded training issue. Much to Licensee's disappointment, the Staff testimony deals only with a methodology for reviewing the training program and "does not address the actual content of the training program" at all. See Testimony of Julius J. Persensky, Joseph J. Buzy and Dolores S. Morisseau on the Remanded Training Issue from ALAB-772, at 2. This is the case even though there have been numerous Staff reviews of the program in the past several years, such as inspection reports

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Ivan W. Smith, Esquire Sheldon J. Wolfe, Esquire Mr. Gustave A. Linenberger, Jr. November 26, 1984 Page 2

and other documents, e.g., NUREG-0680, Supp. 5, and even though the Staff's current view of licensed operator training at TMI has been expressed during the discovery process, e.g., in response to UCS interrogatories, document production requests and depositions.

Licensee was aware of the Staff's position on the scope of the remanded proceeding and, in view of that position, and having seen the Staff's testimony, has given considerable thought to the absence in the record of the Staff's views of the quality of the current licensed operator training program. After considering the matter, Licensee has concluded that it need not endeavor to have this information put on the record because the testimony of the OARP Committee and Licensee's company witnesses thoroughly address the merits of the issue. Nevertheless, Licensee thought it would be prudent to focus the Board's attention on this matter at this time, recognizing that the Board itself might want to call as Board witnesses appropriate NRC Staff inspectors or other Staff members and, if so, it would be more feasible to accomplish this during the scheduled hearing if the matter were resolved now.

Respectfully yours,

Deborah B. Bauser

Counsel for Licensee

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cc: Service List

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

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