Staff October 19, 1984

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

METROPOLITAN EDISON COMPANY, ET AL.)

(Three Mile Island Nuclear Station,)
 Unit No. 1)

Docket No. 50-289 (Restart Remand on Management)

NRC STAFF'S SECOND SUPPLEMENTAL RESPONSE TO INTERVENOR UNION OF CONCERNED SCIENTISTS' FIRST SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF

Pursuant to the Licensing Board's rulings at a prehearing conference on September 24, 1984 and its oral ruling in a telephone conference call of October 18, 1984, the Staff provides the following supplemental responses to Intervenor Union of Concerned Scientists' First Set of Interrogatories to NRC Staff. In accordance with the directions of the Licensing Board, answers are being provided for the period of time beginning with the close of the record in this proceeding, that is, October 1981. Tr. 27510. The provision of answers to these interrogatories is not a representation by the Staff that the information is relevant to the issues to be heard in this remanded proceeding.

INTERROGATORIES

Interrogatory 2

Identify all individuals whom the NRC Staff intends to call as witnesses on the remanded issues related to the GPU training program. For each

such witness, state or identify the following:

h. The topics to be covered in the individual's testimony.

Response

Mr. Buzy, Ms. Morisseau, and Dr. Persensky will prepare testimony as a team. Their respective roles are:

Mr. Buzy - Subject Matter Expert on nuclear operations

Ms. Morisseau - Training Assessment Specialist and Behavioral
Scientist

Dr. Persensky - Management Oversight and integration of responses

as responsible supervisor with expertise in

training and behavioral sciences

The testimony will be limited to addressing the Reconstituted OARP Committee's testimony and Special Report insofar as they address the questions raised by the Appeal Board remand of May 24, 1984 (ALAB-772) regarding the quality of the TMI-1 training program. The approach which the Staff intends to use in preparing testimony is: to take each Appeal Board question, combined by issue where appropriate, and to review the conclusions on these issues in the OARP Report of June 12, 1984, information contained in Licensee's responses to interrogatories in this proceeding, and Licensee's testimony, when available; and to provide the Staff's comments on the conclusions reached by the OARP Committee. Team conclusions regarding these comparisons will be part of the testimony. At this time, the above response is as specific a description of the topics to be covered as possible.

Interrogatory 9

It has come to the Staff's attention that it possesses further information responsive to Interrogatory 9. That additional information is set forth below.

Supplemental Response

- (a) Interviewees were guaranteed anonymity, and thus names of individual operators were not taken by those conducting the interviews. This is indicated in the fourth paragraph on page 3-11 of NUREG-0680, Supplement No. 4, TMI-1 Restart.
- (b) Messrs. Samuel E. Bryan and Jerry A. Wachtel of the NRC Staff have conducted interviews of TMI-1 operators, as described below.
- (c) Messrs. Bryan and Wachtel interviewed twenty persons (11 ROs, 8 SROs and 1 STA) during the period June 13-17, 1983 to evaluate TMI-1 operator attitudes toward procedures and procedural adherence, and opinions about management policies relative to procedural adherence. The individual answers were not kept; however, NUREG-0680, Supplement No. 4, TMI-1 Restart, characterizes the responses and provides the questions asked. This information is contained in Section 3.3, Procedures and Adherence, of the report and in Appendix D, NRC Staff Evaluation of TMI-1 Operator Attitudes Toward Procedures and Adherence, to the report.
- (d) The only written documentation of the interviews is contained in the document sections identified in response to Interrogatory 9(c).
- (e) Staff evaluation, conclusions, and documentation regarding the interviews are contained in Section 3.3.1.5 of NUREG-0680, Supplement No. 4, TMI-1 Restart.

Interrogatory 10

Does the NRC believe that the OARP relied too heavily on memorization?

Response

The Staff has no basis for determining the extent to which the OARP relied on memorization.

Interrogatory 11

Provide the basis for the answer to #10.

Response

See response to Interrogatory 10.

Interrogatory 12

Does the NRC believe that any other GPU training program relied or relies too heavily on memorization?

Response

No.

Interrogatory 13

Provide the basis for the answer to #12.

Response

The GPU licensed operator training program is a multifaceted program consisting of classroom instruction, simulator training and on-the-job training, evaluated by both oral walk through examinations and written examinations. The training program is designed to develop and test both knowledge of specific subjects and analytical skills required to utilize that knowledge. NRC inspections indicate that the overall training program strikes a proper balance and is performing its intended function.

Interrogatory 16

It has come to the Staff's attention that it possesses further information responsive to Interrogatory 16. That additional information is set forth below.

Supplemental Response

Samuel E. Bryan visited the B&W training facility in Lynchburg,
Va., February 23 and 24, 1984 to observe a simulator demonstration of
the Steam Generator Tube Rupture (SGTR) emergency procedure. The
simulator exercise confirmed Staff's conclusion that the SGTR procedure
was acceptable. This visit was made during training on the new emergency
operating procedures. No documentation of the visit was made. This
observation was for procedure implementation purposes, not to assess
whether the training program conforms with content of plant procedures.

Interrogatory 19

State what the Staff has done to review the accuracy of the facts and opinions presented in the Special Report of the Reconstituted OARP Committee, June 12, 1984. Identify the reviewer(s) and provide all written documentation of the review.

Response

The Staff is continuing to review the "Special Report of the Reconstituted OARP Review Committee." The Staff has reviewed information contained in the Licensee's responses to interrogatories in this proceeding. The Staff also is performing a comparison of the findings of the Reconstituted OARP Committee against Inspection Reports, SALP reports, and other available staff evaluations, insofar as relevant to the questions raised by the Appeal Board remand of May 24,

1984 (ALAB-772). The reviewers are the Staff witnesses identified in response to UCS Interrogatory No. 2. No written documentation of the review exists at this time.

For the NRC Staff

Mary E. Wagner (Counsel for NRC Staff

Dated at Bethesda, Maryland this 19th day of October, 1984

UNITED STATES OF AMERICA-NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETING & SERVICE BRANCH

In the Matter of

METROPOLITAN EDISON COMPANY, ET AL.)

(Three Mile Island Nuclear Station,)
Unit No. 1)

Docket No. 50-289 (Restart Remand on Management)

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S SECOND SUPPLEMENTAL RESPONSE TO INTERVENOR UNION OF CONCERNED SCIENTISTS' FIRST SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, by deposit in the Nuclear Regulatory Commission's internal mail system, or, as indicated by double asterisks, by hand delivery, this 19th day of October, 1984:

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