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RELATED CORRESPONDENCE

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Ernest L. Blake, Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036

Dear Ernie:

I am writing to respond to your two letters of October 22, 1984 which were delivered to me on Tuesday morning, October 23.

I would like to address both your and Mr. Wilson's comments in your first letter about specific documents which I believed were not properly disclosed to TMIA in discovery. Secondly, I wish to address the current document production system which I believe has caused some problems and aggravated other problems of document production in this case.

First, after review of the document requests I have made recently in this case I agree that I did not make a request to review or have produced a copy of Mr. Abramovici's interview given to the NRC. Therefore, I apologize for my statement that the Abramovici interview was deliberately withheld. I would like to explain, however why I believed I had ordered the interview and the general confusion regarding GPU's production of documents in this case.

I would like to add some background to my complaints in my October 16, 1984 letter to you which you have omitted. In fact I did make a request following the last deposition in Harrisburg on Friday afternoon, October 5, 1984, to gain access to the Shaw, Pittman Document Room the following Monday, October 8. As you know, at the time we then had depositions scheduled in Harrisburg for the following Wednesday and Thursday, October 10 and 11. Because of the rules of the Document Room it is not possible to have documents copied unless one allows 24 hours for copying. Given that restriction, I wished to review the documents on Monday, October 8, in order to have the documents available for the October 10 and 11 depositions. At that time I told you that I would come into Shaw, Pittman between 12:00 and 2 p.m. on October 8 to review the documents. The intent of that statement was that I would enter Shaw, Pittman's offices at some time on October 8 between those times and stay some additional time to review the documents.

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I returned to my office Saturday morning to find a telephone message from someone in my office who had received a call from Shaw, Pittman which stated as follows: Dave Rubinton (an Antioch student who works in our clinic), Joanne Doroshov and you are cleared with security at Shaw, Pittman on Monday, October 8. I assumed from the telephone message that all three of us were cleared to review documents at any time during the day.

On Monday I called Shaw, Pittman at about 2:15 to indicate that I would be coming to the firm to review documents within a short time. At that time the receptionist stated that she had spoken to a paralegal and that apparently there would be no problem with my coming over to the firm to review the documents. At the time I arrived a paralegal, who I had not met before, said she was working on another case and could not help me. (The firm appeared to be quite busy, even though it was a federal holiday.) I informed the paralegal that I was familiar with the organization of documents and that if she would simply bring the requested documents to the discovery room I would have no problem in reviewing them and requesting the necessary copies without her assistance. She said that she could not do that.

Subsequently I spoke to Ms. DeBow who was at home. I informed her that given our deposition schedule for Wednesday, and the requirement of 24 hours to copy documents, we would not be prepared for the depositions if we could not be provided access to review the documents that day. After unsuccessful attempts on both our parts to reach you at your home, Ms. DeBow agreed to come to the office to assist me in reviewing the documents. At the time she arrived at the office, around 4:30 p.m. I had returned to my office for a copy of TMIA's discovery requests and was in the process of making a list of the documents I wished to review or copy.

As you know, GPU has not provided an index of the documents which it has produced in response to our discovery requests. Therefore, in essence, TMIA has to know that a particular interview or deposition exists in order to request it, or make a general sweeping request for all interviews of a particular individual.

Further, GPU has made additions to its responses to specific interrogatories and document requests without specifically informing TMIA of this supplementation. Therefore, it has been necessary to do a complete re-review of the documents GPU has produced in response to TMIA discovery requests in order to pick up any additional documents which have been added since the last review. (This is contrast to your prior practice in which you

placed the documents which supplemented prior responses in separate folders with the date on which the documents were placed in the Document Room.) As you know, this led to our late review of the notes of Mike Morrell, on which was based in part TMIA's recent motion to extend the discovery period.

In any case, after ordering the depositions and interviews which I wanted, I began a review of the entire set of documents produced in response to TMIA's First Set of Interrogatories and First Request for Production. I completed my review in about 45 minutes, and ordered a number of documents in accordance with the instructions I had received from a paralegal with whom I had spoken prior to speaking to Ms. DeBow and in accordance with the written instructions in the Document Room.

When Ms. DeBow returned I gave her my order of documents to be xeroxed. She then told me that one had to use a different system to order documents, different than the prior system in which I had been instructed and the one which was in written form in the Document Room. She and I then spent 30 minutes re-writing my request for documents in accordance with these new instructions.

As I have told you on prior occasions, I do not believe this system allows TMIA or its counsel adequate access to the documents GPU has produced in the course of discovery in this case.

In addition, as I have explained to you at a prior time in September, Mr. Rubinton, a student who has spent several days reviewing interviews and depositions in your Document Room has had similar problems. For example, on one day in September, he made four separate requests for particular documents. He gave me the four separate request forms he filled out on that day. Ms. DeBow was unable to produce the requested documents in response to those four requests. Only after I made the very same request of you, and you made the request of Ms. DeBow in the exact same form as Mr. Rubinton's fourth request were the documents produced for TMIA. This particular request consumed at least two hours of Mr. Rubinton's time and about one-half hour respectively of my time and your time.

Moreover, on October 18, 1984, you informed me for the first time in the course of discovery in this case that GPU would not make available documents produced in this case past the discovery cutoff date of October 15, 1984. At that time GPU was still supplementing responses to TMIA's prior discovery requests and TMIA had not had an opportunity to review these supplemental responses. At that time I informed you that it was my experience that documents produced in the course of discovery were to be made available from the time they were produced up until the time

of the hearing. I also stated that it was my understanding that this had been the practice in the course of discovery in these proceedings. Since Ms. Doroshov wished to review certain documents in preparation for Mr. Lowe's deposition, scheduled for 11:00 a.m. on Friday, October 19, 1984, I told you that I would seek the intervention of the Licensing Board if we were denied access to the documents to prepare for that deposition. You accepted my request and in reconsidering later stated that you would make the documents available until November 7, 1984.

In your second letter of October 22, you placed the additional condition on TMIA that it inform you one day before any review of documents in the Document Room of its desire to review documents. Although I believe that this condition creates a burdensome process and unduly restricts TMIA's access to the documents I have agreed to attempt to comply with this new rule.

As I have stated to you at prior times, I would prefer to work out a document production system which provides TMIA adequate access to the documents on a regular basis. That has not been worked out so that we have encountered the problems we have today.

Second, I still believe that GPU should have produced and did not in fact produce the Abramovici notes and Lentz notes identified in the course of the Abramovici and Lentz depositions held on October 15, 1984. In the case of these two sets of notes, they are notes which fall within TMIA's discovery requests, are similar to notes of other individuals which have been produced in discovery in this litigation, and are clearly relevant to the issue at hand.

I stated in my letter of October 16 that it appeared that Mr. Abramovici notes may contain references to the incore thermocouple temperatures and actuation of containment sprays. I have drawn this conclusion from the following testimony of Mr. Abramovici. (I have attached the relevant pages of his deposition.)

1) Mr. Abramovici testified that he believed he took notes of the briefings by Kunder and Bensel on March 28. He stated that if he still maintained notes taken during one presentation he would have maintained notes taken during the other. Transcript at 28

2) Mr. Abramovici testified that he believed either Mr. Bensel or Mr. Kunder told him and others that "core thermocouples were peaked high, which would have been probably in excess of 2500." Upon showing him Mr. Moore's notes for a 5:00 p.m. briefing in which it is indicated that the individual giving the briefing stated that incore thermocouple temperatures read in excess of 2500 degrees F, Mr. Abramovici testified that he believed he had heard that briefing, although he did not recall whether Mr. Bensel or some other individual had given it. Tr. at 22

3) In addition, Mr. Abramovici testified that he had answered in his questionnaire to GPU that he had learned of actuation of the containment sprays on March 28 because that was his best memory at that time. Tr. at 36

4) In response to questions about who informed him of the actuation of the containment sprays Mr. Abramovici stated "I think one of the individuals--again, I don't even remember if it was Bensel, I can't even remember--I heard there was an actuation. I couldn't even tell where I heard it from." Tr. at 35 (Note that the transcript is incorrect in attributing this statement to Mr. Wilson. Mr. Wilson made an objection as to form, and then Mr. Abramovici went on to answer the question posed.)

I believe that given Mr. Abramovici's testimony on October 15, it is reasonable to conclude the following:

1) Given that Mr. Abramovici had taken notes of the Bensel presentation and given that Mr. Moore's notes indicate that someone possibly Mr. Bensel, informed him of 2500 degrees temperatures, Mr. Abramovici's notes of the Bensel presentation, if he still had them, may indicate a briefing of such temperatures.

2) Given that Mr. Abramovici had stated that he learned of the actuation of the containment sprays on March 28 or perhaps the early morning of March 29, and given that he took notes of briefings by Kunder and Bensel, and perhaps other notes, it is possible to infer that his notes of March 28 might mention containment spray actuation.

3) Mr. Abramovici's notes of March 28 and 29 are relevant to his knowledge of hydrogen, the pressure spike, core damage and incore thermocouple temperatures on March 28 and the early morning of March 29.

I have not yet had the opportunity to review Mr. Abramovici's notes, now produced in the Document Room. However given the fact that there is a mention of "H2 concentration unknown" on the top of one page, it appears that it was clear from the start that Mr. Abramovici's notes were within the scope of permissible discovery.

Moreover, it appears from Mr. Wilson's statement about these notes, which appears on page 4 of your October 22 letter, that he did review Mr. Abramovici's March 28 notes prior to his deposition. In addition, GPU was previously aware of these notes since Mr. Abramovici produced them in response to a request from the NRC in the course of its original investigation into the Accident.

Therefore I believe that GPU was under an obligation to produce the Abramovici notes prior to his deposition. It was only after Mr. Abramovici himself identified the notes that they were made available.

Third, I believe Mr. Lentz' notes of March 28 should have been made available. As you know TMIA believes that the lines of reporting between the GPUSC engineers sent to the site on March 28 and GPUSC top management in Parsippany is information relevant to the issue before the Board. Mr. Lentz's notes from a morning meeting in Parsippany establishes the tasks given to the five GPUSC engineers who were sent to the site on the first day of the Accident. Mr. Lentz was one of those five engineers. In order to determine what information was transmitted from the site to Parsippany on March 28 and March 29 one needs to understand the reporting relationships established for the GPUSC engineers sent to the site. This is especially important when none of the five GPUSC engineers now remembers the time he reported back to Parsippany.

Further, Mr. Moore's notes of this same morning meeting in Parsippany have been produced in the course of discovery in this proceeding. Mr. Lentz apparently produced these documents to Mr. Wilson and Mr. Wilson, in return, produced them to me in the course of the deposition. It appeared as though Mr. Lentz considered them relevant to his actions on March 28, at least to the extent of providing them to Mr. Wilson for production in this proceeding. (Mr. Lentz stated that he had produced the same packet of documents in the course of the GPU v. B&W litigation as well.)

My review of the two-pages of Lentz notes indicates that in fact the notes lay out an assignment of tasks for various GPUSC personnel, both the engineers sent to the site and top GPUSC management who remained in Parsippany. Therefore, the notes themselves bear out the relevance which TMIA places on them--that is they help establish the line of reporting within GPUSC established on March 28 between the site and Parsippany.

Further, I do not understand what Mr. Wilson's statement means that I misrepresented Mr. Wilson "indicated that he would produce the Lentz notes from March 28, 1979 during the deposition..." He did in fact produce the notes during the deposition. After Mr. Lentz had provided me with copies of his original notes, Mr. Wilson pulled from his briefcase a copy of these same notes. The point I made in the letter was that Mr. Wilson provided me with a copy of the notes only after Mr. Lentz provided them to me.

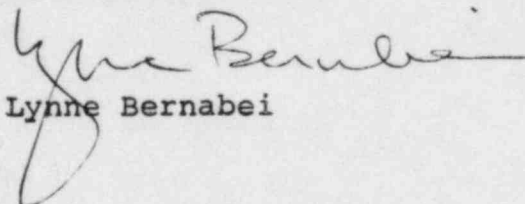
I also would like to correct your statement in your letter which states that "Licensee's lone request for a copy of TMIA documents was made on October 2 and still is not fulfilled although it involved only six documents." TMIA, in response to your document

requests on the Dieckamp Mailgram Issue has identified all documents within its possession and control. I produced one document, which you did not previously possess, in the course of our putting together the Mailgram Stipulation. I also indicated that I had copied and would make available to you certain memoranda which you might not otherwise have available. In response to a specific request from Mr. Lewis for six documents I made them available. In one case I have not been able to find a copy of particular notes, but indicated that at such time as I do find them I will make them available. As Mr. Lewis knows, these notes are quoted verbatim in the Raymond Interview, which I have produced for you. Further, these documents are all interviews which were conducted in the course of the NRC, Kemeny or Senate investigations into the Accident. Once I understood Mr. Lewis' specific request I attempted in an expeditious manner to copy and send you the documents. Other than the Raymond notes I believe I have made all the interviews which you requested available to you.

In conclusion, I did not lightly state that I believed certain documents have been deliberately withheld from TMIA in the course of document production in this case. As I stated earlier in the letter I was wrong with regard to the Abramovici NRC interview. However, I continue to believe that GPU was not forthright in its production of the Lentz notes and the Abramovici notes.

Finally, I wish to set up a time to discuss Licensee's Response to TMIA's Fifth Set of Interrogatories. By my calculations TMIA must file a motion to compel by October 29. Therefore I suggest that we meet to discuss licensee's response on Thursday, October 25. Please contact me as to whether or not you will be available on that date.

Sincerely yours,


Lynne Bernabei

cc: Service List

1 A Previously, no.

2 MR. WILSON: May we go off the record for a second?

3 (Discussion held off the record.)

4 A Like I say, I'm still not sure if it was Benson or
5 Bensel, but it was Dick, I remember.

6 BY MS. BERNABEI:

7 Q It was Richard, okay, Dick.

8 A And he was an electrical engineer.

9 Q If I represent to you that person who was an electrical
10 engineer at that time with the first name of Richard was
11 Bensel, that would sound right to you?

12 A If I see his face or picture, I could recognize him.

13 Q But he was an electrical engineer with the first name
14 of Richard?

15 A Right.

16 Q How did it come about that you were briefed by Mr.
17 Bensel?

18 A Like I said before, he just came there. I don't know
19 who called him or....

20 Q You took certain notes of the briefing?

21 A That's correct.

22 Q Did anyone else, to your knowledge, take notes of
23 that briefing?

24 A I think so.

25 Q Who was that?

1 A Like I say, I don't remember who was there with me, but
2 I know that whoever was there, I remember I was writing because
3 they were writing. I was still in my learning stages of
4 engineering, so....

5 Q Do you remember Mr. Bensel mentioning to you that in-
6 core thermalcouple temperatures in excess of 2500 had been
7 read?

8 A I can't say for sure whether he told me or the person
9 subsequent to him who we interviewed, but I do recall that the
10 core thermalcouples were peaked high, which would have been
11 probably in excess of 2500.

12 Q I'd like to show you what has previously been marked
13 as Moore Exhibit 1; specifically, certain notes or handwritten
14 notes which Mr. Moore has identified as notes he took at the
15 5:00 p.m. briefing on March 28th.

16 I'd like you to review the two pages which appear
17 under 5:00 p.m., March 28th, and see if that's the substance
18 of the briefing that you remember Mr. Bensel gave you at that
19 time or on that date.

20 A Yes, they are. The facts seem reasonable. I just
21 don't recall whether it was Bensel or somebody else.

22 Q But the substance of what appears in that two pages,
23 does that accord with your recollection of what was told you
24 that day at the Observation Center?

25 A To the best of my recollection, yes.

1 Q Was there any discussion at the time that you
2 learned of the in-core thermalcouple temperatures in excess
3 of 2500 degrees of what significance that had in terms of
4 core damage?

5 A Again, to the best of my recollection, somebody did
6 say -- and again, I can't say if it was Dick Bensel or some-
7 body in the group or George Kunder who interviewed afterwards--
8 but there was an indication of core damage.

9 Q Did they link it into these high temperature readings?
10 That is, did anybody indicate that being over 2500 degrees
11 indicated core damage?

12 A I don't remember that.

13 Q But someone did speak about the fact that there had
14 been core damage suffered?

15 A That there was potential for core damage.

16 Q Was there any discussion at the time again when you
17 heard about the thermal couple readings that that is infor-
18 mation that should be reported to the NRC?

19 A I do not recall.

20 Q It may have been discussed, you just can't remember?

21 A I do not remember.

22 Q Did Mr. Moore or yourself or anyone else talk about
23 reporting this back to your home office, to Parsippany?

24 A I do not recall.

25 Q Do you know if this information was reported back

1 to your home office?

2 A As I previously stated, Jim Moore indicated that he
3 did call back to Parsippany.

4 Q Did he indicate that he had informed them of what
5 he had learned the first day, March 28th?

6 A I don't know what he informed them or who he talked
7 to.

8 Q But he did indicate he called at some time after he
9 received this information?

10 A I don't remember. It would be just purely specu-
11 lation on my part to say yes.

12 Q Now, after Mr. Bensel briefed you, Mr. Kunder
13 briefed you, is that correct?

14 A That's correct.

15 Q How did it come about that Mr. Kunder briefed you?

16 A He came in from the control room. Who called him
17 or how he got there, I really don't know.

18 Q Was this a briefing primarily of your group of five
19 from the Service Corporation?

20 A That's what I remember, yes.

21 Q So --

22 A Well, by saying five, again, I don't know if there
23 were three or five or two.

24 Q However many were there?

25 A Yes.

1 Q It's fair to say that whoever was in the Observation
2 Center was probably included in these briefings; that is,
3 whether --

4 A No.

5 Q Not necessarily?

6 A No. There were many more people in the Observation
7 Center.

8 Q I'm talking about just Service Corporation people.
9 There's five in your group. What I'm saying is it's fair to
10 say that whenever they arrived, they became part of these
11 briefings?

12 MR. WILSON: Objection as to form.

13 BY MS. BARNABEI:

14 Q Do you understand my question?

15 A I guess not.

16 Q There were five of you that came down from Parsippany,
17 is that correct?

18 A The five that I know of, yes.

19 Q The five that you know of. And people arrived at
20 different times?

21 A That's true.

22 Q What I'm asking you is in terms of these two briefings,
23 starting off with the five o'clock one, is it fair to say
24 that as many of the five of you as had arrived participated
25 in that briefing, listened to the briefing?

1 MR. WILSON: Objection as to form.

2 A I'm not sure again what you're asking. I think
3 there was -- that some of us were present. If there were
4 other people from the Service Corporation....

5 BY MS. BARNABEI:

6 Q No, let me ask the question again. I'm not phrasing
7 it properly.

8 You arrived at somewhat staggered times, you and
9 the five. Now, I'm not talking about anybody else, but the
10 five of you in your group.

11 What I'm saying is, is it likely that whoever had
12 arrived at 5:00 p.m. listened to Mr. Benseal, participated or
13 listened to the briefing?

14 MR. WILSON: I still have to object as to form; is
15 it likely that.

16 MS. BENSEL: I'll ask the question a different way.
17 Is -- Well, I'll leave the question.

18 A As I say, I know at least one more other than me
19 was there. Whether there were five or four or three, I don't
20 remember.

21 BY MS. BARNABEI:

22 Q But whoever had arrived at the Observation Center,
23 did they come to the briefing?

24 A I couldn't say.

25 Q You don't know, okay.

1 Now, what did you learn from Mr. Kunder?

2 A Again, I would have to go back to my -- I just
3 don't recall at this point. You know, still more information,
4 a lot of the same thing that we had already learned previously
5 from Dick Bensel.

6 Q Did Mr. Kunder have with him a sequence of event
7 recorder, any hard data from that recorder?

8 A I don't recall.

9 Q Do you remember him referring to the sequence of
10 events recorder?

11 A Again, I remember one of the two mentioning computer
12 alarm events recorder, computer alarm recorder that could not
13 keep up with the alarms, that whenever they were printed, were
14 actually printed minutes after the actual alarm took place,
15 but whether it was Bensel or Kunder, I do not recall.

16 Q But one of those two --

17 A One of those two, yes.

18 Q Did they mention any other data or forms of data
19 about the accident?

20 A I recall mentioning of the so-called reactimeter
21 data, which as soon as it became available, B&W would have
22 the first crack at it because from what I recall, it belonged
23 to them. Then subsequent to that, we could get a dump for
24 us. That's a computer dump, computer printout.

25 Q Do you remember Mr. Kunder mentioning anything about

1 the status of the reactor at that time; that is, at or about
2 6:00 p.m.?

3 A I don't remember.

4 Q Did you take notes of this briefing or did Mr.
5 Kunder?

6 A Yes.

7 Q Do you maintain those in your file?

8 A If I have Bensel, I'll have Kunder.

9 Q Whatever notes, if you maintained them, you would
10 have them both?

11 A That's correct.

12 Q To your knowledge, you produced them for the company
13 in the course of this litigation?

14 A Not for the company. I know I had them with me at
15 that interview with NRC and they asked me if they can make
16 copies of those notes.

17 Q And they did make copies, to your knowledge?

18 A I produced them. I'd also like to mention, there
19 was a divisional representative from the company. I think
20 his name was Brown, and for all I know, he may have made a
21 copy for the company, but I'm not -- I couldn't say.

22 Q What did you do after the briefing by Mr. Kunder?

23 A Again, from what I remember, we stayed around the
24 observation center until sometime that night. I don't recall
25 when. I think it probably went into the night.

1 Q When you say we, who else?

2 A Me and George Lehmann for sure, and I'm pretty sure
3 Jim Moore, but again, I just -- The reason I'm pretty sure of
4 George Lehmann is because we came back in this same car and
5 we stayed as a pair. I do recall that Rich Lentz and Gary
6 Broughton went back to the hotel and told us when the reactimeter
7 data gets back, give them a call and they would be back.

8 Q What time did they leave?

9 A I don't remember.

10 Q Mr. Lentz went into Unit-2, did he not, to collect
11 some data?

12 A He did go into the unit to the control room, yes.

13 Q What time was that?

14 A It was sometime later on the 28th or early on the
15 29th, I don't recall the exact time.

16 Q What data did he collect when he was in the control
17 room?

18 A He brought back some data, I don't recall what form
19 they were in.

20 Q It was computer data?

21 A I don't recall.

22 Q It didn't include the reactimeter data, is that fair
23 to say?

24 A I don't remember.

25 Q Did it include any of the alarm printouts?

1 A I don't remember. I know we had some pressure and
2 temperatures, but that's all I remember. However they came
3 through, I don't know. I remember it was in tabular form.

4 Q When you say in tabular form, what do you mean; as
5 though in a log or on a computer?

6 A I remember a form that had pressure and temperatures
7 versus time and other data.

8 Q Do you remember seeing any strip charts or strip
9 charts of pressure temperature or copies of those?

10 A No, I do not.

11 Q You can't remember any alarm printouts?

12 A I just don't remember. They may have been there, I
13 just don't remember.

14 Q Do you remember for what time period he collected
15 data? Again, we're talking about this March 28th period.

16 A I do not.

17 Q Did you review this data at the time he brought it
18 back to the Observation Center?

19 A We -- again, we is me and others; again, I don't
20 recall who the others were -- we started to plot the pressure
21 versus temperature.

22 Q Did this include Mr. Broughton?

23 A I don't remember. Probably, but I don't remember.
24 It would just be speculation.

25 Q Did you plot or did you use this data in any other
way?

1 A I'm sorry?

2 Q Did you use or plot this data any other way?

3 A We plotted, yes.

4 Q What other kind of plots other than the one you've
5 described did you make?

6 A That's all I remember, just the pressure versus
7 temperature to determine whether we reached saturated
8 conditions or not in the reactor.

9 Q And you in fact determined you had reached saturated
10 conditions, is that correct?

11 A That's correct.

12 Q I'll show you what's been previously marked as Lentz
13 Exhibit 3. I can tell you it's a number of pages of notes of
14 Mr. Broughton, which he took on March 28th.

15 Specifically, I'd like to refer you to the two plots
16 that he stated that he and others made on March 28th and ask
17 you if you can identify those two plots.

18 A I know we plotted something, but whether it was this
19 or not, I just don't remember.

20 Q Can you review both? There's two plots there, one
21 on page seven and page eight.

22 A Both, yes.

23 Q Do either one of those look familiar to you?

24 A No.

25 Q Now, reviewing this for a moment, what kind of data

1 is necessary to make those two plots?

2 A This one appears to be steam generator pressure,
3 steam generator level. I would say B, feed water flow.
4 Pressure, steam generator pressure is here. I don't know if
5 they mention or not. On the second graph, it's pressurizer
6 level, primary pressure, saturation pressure, primary temper-
7 ature, and obviously time. In looking here, I think also B
8 is temperature was his primary -- or steam generator -- looked
9 like primary temperature.

10 Q Do you know what form one could obtain that data
11 from TMI? In other words, what form would that data come in?

12 A From my recollection of what the reactimeter data
13 looked like, I would say this would be easily obtainable from
14 the reactimeter data.

15 Q Assuming that the reactimeter data was not available
16 at that time, where would that information likely come from
17 or where could it be obtained?

18 A I think it would just be purely speculation on my
19 part.

20 Q In your prior interview you stated -- I'm sorry,
21 your interview with the NRC on June 11th, 1979 -- on page 10
22 you state that Mr. Lentz went into the control room when he
23 brought the sequence of events and he also brought some pre-
24 liminary data.

25 What sequence of events were you talking about at
that time?

1 MR. WILSON: Objection. May the witness see his
2 testimony?

3 BY MS. BERNABEI:

4 Q Sure, would you like to?

5 A I don't know if it's going to refresh my memory or
6 not.

7 Q Top of the page on page 10.

8 A I don't recall. It probably was the alarm sequence
9 of events, but I just don't recall.

10 Q After Mr. Lentz brought back the data -- and there's
11 been testimony that at this time there were some plots made,
12 and Mr. Broughton has identified the two I've just shown to
13 you as those plots that were made on March 28th -- during this
14 period of time, do you remember any discussions about core
15 damage?

16 A No, I do not.

17 Q Do you remember any discussions about the pressure
18 spike which had occurred previously at 1:50 p.m.?

19 A Pressure spike?

20 Q Yes.

21 A You're talking of the Reactor Building pressure spike?

22 Q That's right.

23 A No.

24 Q Do you recall any discussion with production of
25 hydrogen?

1 A No, I do not.

2 Q Let me ask you this. On March 28th, 1979, did you
3 know that at temperatures greater than 2200 degrees there would
4 be a failure of the fuel cladding so as to produce zirconium
5 steam reaction in hydrogen?

6 A Greater than 2200? The reactor is designed for
7 2500, so I can't see where 2200 would cause --

8 Q I'm talking about core temperatures now.

9 A Core temperatures?

10 Q Core temperatures. You don't know that now?

11 A Like I say, I know the reactor is designed for 2500
12 pounds, 2500 PSI.

13 Q No, no, temperature, not pressure.

14 A I'm sorry.

15 Q We're talking about temperature now. Did you know
16 that at greater than 2200 degrees Fahrenheit --

17 A I knew that at some temperature significantly higher
18 than the design temperature, there would be a water reaction,
19 you know, giving off hydrogen, yes.

20 Q Did you know that at greater than 2200 degrees
21 Fahrenheit --

22 A No, I did not.

23 Q -- that would produce significant quantities of
24 hydrogen?

25 A No.

1 Q Did you know that at greater than 2500 degrees, that
2 reaction would produce significant amounts of hydrogen?

3 A I'm sorry, I confused it before with pressure.

4 Q I understand. Do you know today at what temperatures
5 significant amounts of hydrogen are produced?

6 A I do not. It is not my area of expertise.

7 Q Do you know of any discussion, again in your group,
8 in the Observation Center in the evening of March 28th about
9 the possible production of hydrogen?

10 A On the 28th? I do not recall.

11 Q Do you know of any discussion, regardless of whether
12 you currently remember it?

13 A On the 28th?

14 Q Yes.

15 A No, I don't.

16 Q You became aware at sometime on March 28th of the
17 actuation of the containment sprays, is that correct?

18 MR. WILSON: Objection. Objection as to form. I
19 think one of the individuals -- again, I don't even remember
20 if it was Bensel, I can't even remember -- I heard there was
21 an actuation. I couldn't even tell where I heard it from.

22 Q But someone had informed you then on March 28th?

23 A I don't know if it was -- well, somebody informed
24 me that it was on March 28th, but I don't know if I found out
25 on March 28th or....

1 Q Well, you answered a question there for GPU, did you
2 not, in which you stated on March 28th you learned about
3 actuation of containment sprays on that date?

4 A If that's what I stated, that was my memory at that
5 time.

6 Q How did you learn about that?

7 A Somebody must have said it, I just don't know who.

8 Q That would have been one of the engineers or someone
9 from the control room?

10 A It would be speculation, I just don't remember.

11 Q Before you said maybe it was Bensel, maybe it was
12 someone --

13 A Yes like I say, I just don't want to pin it on some-
14 body that I really don't know for a fact, I just know that I
15 heard of the actuation.

16 Q When you learned of it, what did you learn? What
17 did you hear?

18 A I just don't recall, just the sprays came on.

19 Q Did you know at that time -- assuming you heard it
20 on March 28th, as you stated on your questionnaire -- that it
21 took two out of three independent pressure sensors to detect
22 pressure over 28 PSI to actuate the containment sprays? It
23 had a two out of three logic essentially.

24 A I don't know. It's probably true.

25 Q I'm asking you now if you can think back when you

1 heard this, did you know of the logic?

2 A Two out of three logic? At that time I doubt very
3 much.

4 Q Did you maintain notes when you learned this?

5 A I don't recall. Like I say, whatever notes I have --
6 Like I say, I don't remember anything about the actuation.

7 Q But your best memory is, at the time you filled out
8 the questionnaire, that you learned about it on the 28th, is
9 that correct? That isn't in fact how you filled out the
10 questionnaire.

11 A Like I say, the 28th, at one point I made clear,
12 you know, I came there whatever time, two or three o'clock in
13 the afternoon, and didn't go back to the hotel until sometime
14 the next morning, so considered that time to be one day,
15 March 28th. If it was at three o'clock in the morning of the
16 29th, I still think it was the 28th.

17 Q So, essentially you knew it was sometime in the
18 evening of March 28th or early morning of March 29th prior to
19 your return to the hotel?

20 A Right.

21 Q You don't quite remember now who told you?

22 A I do not.

23 Q Is it fair to say that whoever it was that told you,
24 you considered him a reliable source; that is, someone....

25 A Like I say, I don't recall the individual, I can't