

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

In the Matter of

METROPOLITAN EDISON COMPANY :

Docket No. 50-289-SP

(Restart Remand on
Management - Training)

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

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AND SERVICE
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COMMONWEALTH OF PENNSYLVANIA'S SUPPLEMENTAL
BRIEF IN RESPONSE TO THE PROPOSED
FINDINGS OF UCS (¶¶ 283-287)

On March 13, 1985, the Atomic Safety and Licensing Board requested the views of the parties concerning the Union of Concerned Scientists Proposed Findings ¶¶ 283-287. After review of the Union of Concerned Scientists Proposed Findings and the Licensee's Supplemental Proposed Findings, the Commonwealth of Pennsylvania hereby files a supplemental brief to address the significance of UCS Proposed Findings ¶¶ 283-287.

Licensee admits that it does not conduct formal on-the-job evaluations of control room operator performance. Licensee characterizes the daily, monthly, and annual routines of the operators as "mundane" (Licensee Supplemental Proposed Findings, at 3), and therefore implies the activities are not worthy of evaluation. By contrast, Licensee points to the mastery of complex skills that the operators must acquire in the training program. The Licensee suggests that on-the-job evaluations would serve no useful purpose.

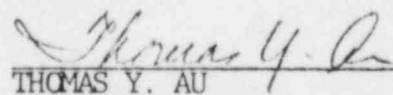
The Commonwealth agrees that the development of complex skills is necessary to the training of a competent operator. Skills can be measured and evaluated in the training program. However, the evaluation of on-the-job performance is also necessary to determine competent day-to-day performance, a matter unrelated to the acquisition of knowledge or skills.

The day-to-day tasks of the licensed operator are not as "mundane" as Licensee suggests. Routine activities, if performed incorrectly, can have far reaching effects. For example, one of the daily activities of the licensed operator is the performance of reactor coolant leak rate tests. Failure of the management to properly supervise and evaluate the operators' conduct of TMI-2 leak rate tests led to the indictment and conviction of Metropolitan Edison Co. in a criminal case (See Statement of the Prosecutor, Feb. 28, 1984). Moreover, lack of attention to a mundane matter (whether a valve was open or closed) contributed significantly to the severity of the TMI-2 accident.

On-the-job evaluations check on a different aspect of operator performance. Evaluations could detect deficiencies in operator performance, which simulator exercises cannot discover. On-the-job evaluations at TMI-1 could have detected the "lack of understanding concerning recordkeeping requirements" and the ignorance of a "loop seal" in the instrumentation system. Inattention to these day-to-day problems formed the basis for the Appeal Board's remand in ALAB-772 (at 153). Because a procedure is routine or mundane does not mean that it is always properly implemented.

For these reasons, the Commonwealth of Pennsylvania believes that the lack of formal on-the-job evaluations of licensed operators is a significant finding, which must be addressed by the Board.

Respectfully submitted,


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Date: March 22, 1985