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January 25, 1985

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

SECRETARY
& SERVICE

BEFORE THE COMMISSION

In the Matter of)
)
METROPOLITAN EDISON COMPANY)
)
(Three Mile Island Nuclear)
Station, Unit No. 1))

Docket No. 50-289
(Restart)

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LICENSEE'S RESPONSE TO AAMODT MOTION FOR
RECONSIDERATION OF COMMISSION ORDER
CLI-84-22 AND OPENING OF A HEARING

On January 15, 1985, Norman and Marjorie Aamodt filed with the Commission a motion seeking among other things to reopen the TMI-1 restart hearing.

As a basis for their motion, the Aamodts allege that "Licensee personnel lied to the Commonwealth." They allege that TMI personnel discounted a 10 R/hr "projected release" at Goldsboro "by claiming, contrary to fact, that surveillance teams had been dispatched and verified that a significant release had not occurred." Aamodt Motion at 4. This allegation is totally unfounded, as even the most cursory research would have indicated.

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The Aamodts state the information came to their attention when "it was provided as the testimony of James (sic) Gamble." Id. What the Aamodts are attempting to refer to is an early draft of a section of NUREG-0760, which was provided as an exhibit to the testimony of David Gamble in the remanded restart proceeding.^{1/} The draft addressed the reportability of an offsite exposure rate that had been predicted for Goldsboro on the day of the TMI accident. The draft was written before the NUREG-0760 investigators conducted any interview regarding this matter, and it summarized the evidence then in existence.^{2/}

The draft of this section stated that a 10 R/hr dose rate for Goldsboro had been predicted by TMI personnel sometime before 7:44 a.m. on March 28, 1979. At 7:46 a.m., an onsite monitoring team reported less than 1 mR/hr west of the Unit 2 reactor building, and this measurement together with low containment pressure provided a basis for discounting the prediction. At about 8:30 a.m., the first offsite measurement was taken at Goldsboro. This measurement was also less than

^{1/} Gamble, ff Tr. 30,522, exhibit 6. This exhibit to David Gamble's testimony was not admitted for the truth of its contents, but only to show that sections of NUREG-0760 had been drafted prior to the completion of interviews. Tr. 30,502.

^{2/} The NUREG-0760 investigators had been instructed to rely, to the extent possible, on the evidence already developed in the NUREG-0600 investigation and elsewhere. See Gamble, ff Tr. 30,522, exhibit 2.

1 mR/hr. These draft findings were all ultimately incorporated into the final version of NUREG-0760. See NUREG-0760 at 31-32.

The draft, however, also referred to a May 3, 1979 I&E interview of Thomas Gerusky, the Director of the Pennsylvania Bureau of Radiation Protection. That interview suggested that the Commonwealth had been informed before 8:00 a.m. that a measurement of less than 1 mR/hr had been taken at Goldsboro. See Aamodt Motion, attachment 4 at 15, quoting NRC Interview of Thomas Gerusky (May 3, 1979) at 14. The NUREG-0760 investigators then reinterviewed Mr. Gerusky and explored this inconsistency. Mr. Gerusky told the NUREG-0760 investigators that the Commonwealth had been informed of the Goldsboro dose rate prediction and of the onsite measurement before 8:00 a.m., but it was in fact about an hour later that an actual measurement at Goldsboro was reported to the Commonwealth -- a fact evidenced by the PEMA telephone log. NRC Interview of Thomas Gerusky (October 1, 1980) at 33-41 (attached). Not surprisingly, therefore, the portion of the NUREG-0760 draft which relied on Mr. Gerusky's first interview was not included in the final report. See NUREG-0760 at 31-33.

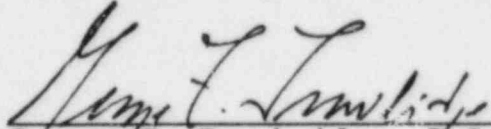
It is evident, therefore, that there is neither new nor significant information concerning the Goldsboro dose rate prediction. The statements which might have appeared at one time to provide a basis for the Aamodt's contention -- Mr. Gerusky's

1979 interview -- have long since been publicly clarified by Mr. Gerusky himself.

The Aamodt's motion to reopen the hearing should be denied.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



George F. Trowbridge, F.C.
David R. Lewis

Counsel for Licensee

Dated: January 25, 1985

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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 In the matter of: :
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 METROPOLITAN EDISON COMPANY :
 :
 (Three Mile Island, Unit 2) :
 :
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Room 202, Federal Building
228 Walnut Street
Harrisburg, Pennsylvania

Wednesday, October 1, 1980

INTERVIEW OF THOMAS GERUSKY

was commenced at 1:30 p.m.

APPEARANCES:

NORMAN MOSELEY, U.S. Nuclear Regulatory Commission,
Office of Inspection & Enforcement.

JOHN CRAIG, U.S. Nuclear Regulatory Commission,
Office of Inspection & Enforcement.

TERRY HARPSTER, U.S. Nuclear Regulatory Commission,
Office of Inspection & Enforcement.

DAVID GAMELE, U.S. Nuclear Regulatory Commission,
Office of Inspector & Auditor.

RICHARD HOEFLING, ESQ., U.S. Nuclear Regulatory Commission,
Office of Executive Legal Director.

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300 7TH STREET, S.W., REPORTERS BUILDING, WASHINGTON, D.C. 20024 (202) 554-2345

1 Q Now you have testified to others, and in fact I
2 notice on your note sheet of your knowledge of the 10-R per hour
3 prediction in Goldsboro --

4 A That's what they gave us.

5 Q Are there other records, notes, or reports or
6 accumulated recollections, any of those things, that might
7 contain additional information concerning --

8 A That particular --

9 Q -- that particular -- for instance, that we could use
10 to nail down more precisely the time in which you received
11 that information. Did you personally receive that?

12 A I think it was on the speaker phone. If I wrote it
13 down, I received it one way or the other, either on the speaker
14 phone or direct phone. Margaret Reilly was there, and she
15 went to get the maps to start her plot of the wind direction,
16 wind speed, and she -- so we both received the information, I
17 believe, over the speaker phone.

18 Q Do you recall what was told you -- what specifically
19 was told you which caused you to no longer give any credibility
20 to the 10-R per hour reading? I'm talking about surveys. What
21 surveys were made, for instance?

22 A Yeah, we were told that there were no onsite readings
23 of any consequence, in that wind direction. We were also told
24 that the containment pressure was still very, very low, and
25 that this was designed -- that the calculation he was using was

1 designed for containment -- for containment design pressure,
2 instead of what the pressure really was. So the explanation
3 that went along with this was that if we are following procedure
4 our procedure says if it's reading 800-R per hour at the dome
5 monitor, this is what the dose rate downwind would be at design
6 lead pressure. However, it's not at design lead pressure, so
7 these numbers aren't real. However, we aren't going to take any
8 chances. We are going to send a team over to check it out,
9 and then we notify PEMA or Civil Defense to be prepared to
10 evacuate people on the west shore.

11 BY MR. GAMBLE:

12 Q Was this all told to you at the same time you received
13 the first report?

14 A No.

15 Q This was the subsequent explanation?

16 A Oh, as we were -- as we were told that they were going
17 to a general emergency, and I recall Dick -- I think -- I'm sure
18 it was Dick Dubeal on the phone talking to both Maggie and me,
19 saying what the dome monitor reading was, and he was having
20 the calculations performed at the point. It may have taken a
21 few minutes, but we also -- he also informed us of the pressure,
22 what the pressure was in the containment building, and that it
23 had not increased significantly, and it was nowhere near design
24 pressure, so he wouldn't have expected these numbers to be over.

25 Q So let me make sure I understand it. It is in this

1 order. First you learned about the dome monitor reading, and then
2 as they were performing the calculations, he talked about the
3 pressure and those things, and then at the tail end of that
4 conversation, you got the calculated reading. Is that the order?

5 A That's about what I remember.

6 Q All within this general conversation?

7 A Yes. And I was asking questions while all this was
8 going on, Maggie was asking questions. "Do you have any people
9 over there now monitoring?" "No, we are starting to send people
10 over."

11 I was under the impression they were going to go over
12 by helicopter, for some unknown reason. I don't believe they
13 went over by helicopter. I thought there was a helicopter there
14 and they were going over by helicopter and get the readings.
15 They got the readings very quickly. At least the time was going
16 by so darned fast. When we got the word back that they didn't
17 have any detectable activity over there, it apparently was a lot
18 longer period of time than I had anticipated, early on, anyway.

19 BY MR. MOSELEY:

20 Q So there was action taken to notify PEMA after the
21 first prediction?

22 A Yes.

23 Q And then some time elapsed before PEMA was called back
24 and said --

25 A Yes, they have in their logs what that time was, and

1 it appeared to be like an hour or something. But I don't
2 remember.

3 BY MR. GAMBLE:

4 Q And was it the reading on the other side of the river
5 that precipitated this second call to PFEMA?

6 A Yes.

7 Q It wasn't an onsite reading, it was the actual reading

8 A No, it was the actual reading from across the river
9 saying they had found no detectable radiation across the river
10 in Goldsboro or down in the general vicinity.

11 BY MR. CRAIG:

12 Q Did you say earlier that --

13 A Excuse me. We told PFEMA to be prepared to evacuate
14 to warn York County to be prepared to evacuate people, but not
15 to evacuate.

16 Q Did you say earlier you were told that the calculation
17 was for design pressure, but it was less than that, and they had
18 an onsite reading?

19 A No, that they didn't have onsite readings. They
20 had onsite reading that indicated no leaks.

21 Q They told you that?

22 A Yes, the people inside had detected no airborne
23 radioactivity.

24 Q Did they associate that with the 10-R per hour dose
25 projection in Goldsboro?

1 A Yes.

2 Q To say that, "We don't really think it's real,
3 because"?

4 A Well, it's a combination of our saying that, and
5 they're saying, "Yeah, we know." I don't know who said it first,
6 but they agreed they didn't believe that it was a real reading
7 in Goldsboro. We said, "Let's not take any chances, let's
8 get prepared just in case."

9 Q But based on an onsite reading, that was part of the
10 basis for not believing that?

11 A That and the very low pressure in containment.

12 Q Okay.

13 BY MR. MOSELEY:

14 Q Let me make sure -- I'm not sure that I'm not confused
15 and I don't want to leave it unclear on the record. Let me
16 tell you what my perception is from other testimony, and you can
17 correct me.

18 My perception is that first call indicated there
19 was this 10-R per hour, but there was some reason to question
20 the validity.

21 A It was a calculated reading based upon -- a
22 calculated dose rate based upon pre-planned offsite accident
23 measurements, using windspeed direction, chi over Q and so
24 forth.

25 Q Okay. And then it's my understanding that that result:

1 in the call to PEMA.

2 A Right.

3 Q And then at some --

4 A We called PEMA.

5 Q You called PEMA, and then at some time later the
6 surveys were made onsite?

7 A No, no. The surveys had been made -- were being made
8 onsite at the time that call was --

9 Q But you didn't have the results?

10 A Yes, we had results that they were not able to detect
11 any activity on the island itself.

12 Q And you had that information at the same time you were
13 told of the projection?

14 A Yes.

15 Q Not some minutes later?

16 A No. Not before -- we had that information before
17 we called PEMA, because when we called PEMA, we really didn't
18 believe there was any need to evacuate anybody, based upon
19 the onsite readings and based upon the pressure in the contain-
20 ment.

21 Q Then subsequently readings were taken across the
22 river which confirmed this discounting or, let's say, hesitancy
23 to believe anything in the first place; is that correct?

24 A That's right. And we received the information from
T.4 25 Met Ed that there were no -- that they detected no radioactivity

1 in Goldsboro.

2 BY MR. GAMBLE:

3 Q Can you tell from your notes, can you put some kind
4 of finger on the time this would have occurred? Your notes
5 started at 0730.

6 A It's probably in the letter.

7 BY MR. MOSELEY:

8 Q Maybe I can give it to you. You might can find it
9 quicker.

10 A No, it was after 7:30. It's a feeling, and I really
11 haven't tried to verify it one way or the other to determine
12 what these times were in the past year and a half, because I
13 didn't think it was that important, but I have a feeling it
14 happened some time between 7:30 and 8:00 o'clock. I believe
15 it was before Dornsife arrived, and it was after Reilly got
16 there, so Reilly got there about 7:30, and then Bill came in as
17 we were doing things, and he was getting updated. I don't
18 think he was there when we were doing that, but I'm not positive
19 You know, the timeframe we -- it was prior to the office opening
20 up, and there was a meeting going on of all the department over
21 at some place in another building. We were sending people over
22 to get them, to bring the secretary back, and to keep -- you
23 know, try to inform as many people as possible, and to get our
24 staff back from the staff meeting that was being held.

25 There was an awful lot of information, a lot of

1 activity going on in our office at the time. So time went by
2 awful fast. I don't remember eating that whole day. I wasn't
3 even hungry. I lost about 10 pounds during the first three
4 weeks. I didn't eat much.

5 Q During the day, didn't you have a secretary manning
6 the phone, the direct line between your office and the site?

7 A We had secretaries manning the phone at some times
8 during the next -- during the first three weeks of the accident,
9 but I don't believe we had a secretary on the phone during the
10 first day. We may have had a secretary on the phone just holding
11 it until somebody came on, and then he would be given to somebody
12 else for information, but the secretary would not have received
13 information during that first 24 hours.

14 Q Okay. I was trying to get at maybe she took some
15 notes.

16 A No, not as far as I know. When we realized that the
17 accident was extending out, we started worrying about 24 hour
18 duty, who was going to cover, and we had girls from other
19 offices coming in and just sitting by the phone, waiting for
20 someone, and if there was a need from the utility side for them
21 to talk to somebody else, she would come and get us. If not,
22 she would just take down some information, and that's it. An
23 awful lot of the survey data was recorded that way.

24 Q But your belief now was this was after March 28?

25 A That we had a secretary who was taking down informatio

1 Q Yes.

2 A Yes. I think --

3 BY MR. GAMBLE:

4 Q Mr. Gerusky, during the time interval from when you
5 received the calculated dose rate of 10-R per hour, and when
6 you received the actual Goldsboro other-side-of-the-river
7 measurements that caused everyone to discount the calculated
8 reading, was there any other information passed during that
9 time, any other onsite measurements or any other kind of informa-
10 tion which would tend to discount the original reading?

11 A I don't remember. I know that we were not very -- we
12 didn't really believe that evacuation would have to take place.
13 I don't think there was any time in there we felt we would have
14 to evacuate people. We just didn't want to take any chances,
15 even, until that reading came back.

16 BY MR. HOEFLING:

17 Q And how long was that, again?

18 A I don't know. I think in reconstructing it, or at
19 least the telephone -- the PEMA telephone duty log indicated
20 it may have been an hour, which surprised me a little bit the
21 first time I heard that, six months ago at another one of these
22 briefings.

23 BY MR. MOSELEY:

24 Q Going back, I have one more specific period to touch
25 on, as we have done in others. George Kunder, who is the utility

January 25, 1985

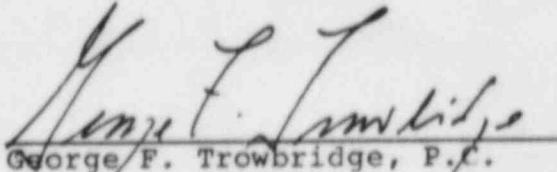
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Response to Aamodt Motion for Reconsideration of Commission Order CLI-84-22 and Opening of a Hearing," dated January 25, 1985, were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 25th day of January, 1985.


George F. Trowbridge, P.C.

Dated: January 25, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-289
)	(Restart Remand
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Station, Unit No. 1))	

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