REPORT OF INTERVIEW

Report Number: 1-84-021

Robert G. LAGRANGE was interviewed by the Reporting Investigator on February 6, 1985. LAGRANGE has been a Section Leader in the NRC's Equipment Qualification Branch, Office of Nuclear Reactor Regulation (NRR), since April 1982, and has been the Three Mile Island Nuclear Station, Unit 1 (TMI-1) Equipment Qualification Reviewer since 1980.

The purpose of this interview was to discuss letters dated May 20, 1983 and February 10, 1984, from General Public Utilities Nuclear (GPUN), to the NRC's Office of Nuclear Reactor Regulation (NRR). The subject of both letters was the Environmental Qualification of electric equipment at TMI-1. During a related interview on December 6, 1984, LAGRANGE advised that both of the above mentioned GPUN submittals contained false statements.

LAGRANGE advised that in December 1982, the NRC transmitted a TMI-1 Safety Evaluation Report (SER) for the Environmental Qualification of safety related electrical equipment to GPUN. He said that augmenting the SER was a Technical Evaluation Report (TER) which was prepared by the Franklin Research Center (FRC) under contract to the NRC. The FRC prepared its' report based on a review of Environmental Qualification documents supplied by the licensee (GPUN). LAGRANGE said that the FRC TER identified major qualification deficiencies to be resolved by the licensee. He said that in both the May 20, 1983 and February 10, 1984 GPUN responses, GPUN indicated that TMI-1 electrical equipment within the scope of 10 CFR 50.49 was environmentally qualified. LAGRANGE said that on March 20 and 21, 1984, he and a consultant (Max YOST from EG&G) conducted an audit of GPUN Environmental Qualification files and found for each file audited, GPUN did not have the appropriate documentation to qualify their equipment. LAGRANGE explained that portions of "NUREG-0588" and "Division of Operating Reactor (DOR) Guidelines" set forth the requirements the licensees had to follow in order to environmentally qualify safety related electrical ecripment to satisfy the requirements of 10

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CFR 50.49. He said the above NUREG and DOR Guidelines were transmitted to the licensees on January 14, 1980, as Attachments to IE Bulletin (IEB) 79-01B. LAGRANGE said that Section 8.0, Documentation, of the DOR Guidelines required the licensees to have complete and auditable records describing the qualification method in sufficient detail to verify that all of the guidelines had been satisfied and that a simple vendor certification of compliance would not be considered adequate. LAGRANGE said that contrary to Section 8.0, when he and the consultant audited GPUN equipment qualification files in March 1984, GPUN did not have complete and auditable records in their files to support the statements in their May 20, 1983 and February 10, 1984 letters that TMI-1 equipment within the scope of 10 CFR 50.49 was qualified. He said that during more recent audits, he noted that the documents used to support qualification were dated often the February 10, 1984 letter. LAGRANGE advised that the March 20-21, 1984 Audit findings were transmitted to the licensee in a letter dated April 25. 1984. He said that several of the findings were given to the licensee orally and with handwritten notes on May 7-8, 1984. LAGRANGE stated that the licensee responded to the Audit findings in a letter to the 300 dated May 31, 1984. LAGRANGE said it was the equipment components identified in the April 7, 1984 NRC letter, which were clearly not environmentally qualified. that, in his view, make GPUN's assertions in their May 20 and February 10 letters talse. He added that the majority of the components identified in the April 25, 1984 NRC letter as being qualified, were previously identified as unqualified in the December 10, 1982 SER/TER provided to the licensee. In addition, LAGRANGE said that in October 1983, his Section had a meeting with GPUN representatives F.G. MAUS, Supervisor, Environmental Qualification, Paul BOUCHEK, Environmental Qualification, and he believes, Roy HARDING, Licensing, to discuss the resolution of their December 1982 TER deficiencies. LAGRANGE said the individual deficiencies were discussed and it was apparent that they (GPUN) did not have the deficiencies resolved and were not ready for the meeting. LAGRANGE said he met with GPUN EQ people again on March 8, 1984 and once again discussed the resolution of TER deficiencies. He said the meeting was taped and transcribed. He said the TER deficiencies discussed included those TER deficiencies identified as corrected in their May 31, 1984 letter which was a response to deficiencies identified in the NRC March 20-21, 1984

audit that was documented in an April 25, 1984 letter to the licensee. LAGRANGE said that during the March 20-21, 1984 audit, neither he nor the consultant were thinking in terms of false statements relative to the EQ documentation deficiencies being noted in the GPUN files. He said they just thought they were finding deficiencies that had to be resolved.

Regarding the May 20, 1983 GPUN submittal, LAGRANGE said that the submittal was in response to 10 CFR 50.49 which required all licensees to identify the electrical equipment important to safety within the scope of Section 50.49(g) that is already qualified, and to submit schedules for environmental qualification for replacement of the remaining equipment that is important to safety as defined in 10 CFR 50.49(b). LAGRANGE said that on the first page of the May 20, 1983 submittal, the licensee stated that:

"GPUN letter dated August 28, 1981 (LIL238) in response to IEB 79-01B lists all safety-related electrical equipment which is required to be and which is already qualified. The additional information we submitted in our letters dated May 3, 1982 (5211-82-101) and May 16, 1983 (5211-83-076) (NUREG-0737 items), support our conclusions that the components listed are qualified in accordance with DOR guidelines dated November 1979."

LAGRANGE stated that the above statement was clearly a false statement in that some of the components GPUN listed as qualified, were not qualified. However, he said that every utility had to respond to the rule and that none of the utilities' responses were relied on or utilized by the LRC in any manner. LAGRANGE said that his EQ Section had decided sometime in the May to August 1983 time period to meet with the licensees and not rely on the responses. He said this decision was made prior to reviewing the responses and indicated that the May 20, 1983 GPUN response was not reviewed until after the March 1984 NRC audit. LAGRANGE said that to his knowledge, GPUN was not confronted with any of the suspected false statements contained in the May 20, 1983 response. LAGRANGE advised that GPUN's May 20 response did not have any impact on any NRC decision-making process nor could he state any special circumstances where the licensee was on clear notice that the NRC had intended to rely on their May 20, 1903 response.

LAGRANGE advised that after the NRC audit in March 1984, it was apparent to him that MAUS was not capable of handling the job. LAGRANGE opined that up until the March 1984 audit, it appeared that MAUS and BOUCHEK were the only GPUN individuals dealing with the Environmental Qualification issue and that there was little or no management involvement. LAGRANGE concluded that it was just too big of a job for two people and that MAUS did not know what documentation was needed. LAGRANGE said that it was not until the exit meeting for the March 1984 audit that Dick WILSON, GPUN Vice President of Technical Functions, and other management officials showed up. LAGRANGE said that other than the NRC exit meeting in March 1984, he was not aware of any circumstances where GPUN management officials had knowledge that environmental qualification deficiencies were not being corrected. LAGRANGE advised that in May 1984, he attended a meeting with GPUN regarding environmental qualifications and Phil CLARK, President, GPUN, attended. He said at this time it was apparent that management was getting involved and it appeared to him that their environmental qualifications program was "turning around".

Regarding GPUN's February 10, 1984 submittal, LAGRANGE previously identified the following alleged false statement: "It is GPUN's position that TMI-1 is currently in compliance with the environmental qualification rule 10 CFR 50.49 as applicable to TMI-1." LAGRANGE stated that the rule 50.49 specifically states that one must have "auditable files" and GPUN did not have auditable files. LAGRANGE said this was established through their March 1984 staff audit of GPUN files and several subsequent audits. LAGRANGE stated that when he received GPUN's February 10, 1984 submittal, he knew that he was not going to rely on the submittal because it was "too vague and did not address all the deficiencies in the TER." He emphasized that by February 10, 1984, he had decided that he would no longer rely on any of GPUN's submittals (made up to that point) concerning their environmental qualification program.

LAGRANGE advised that it was either he or SHEMANSKI who verbally informed the GPU representatives at the October 1983 meeting to make the February 10 submittal addressing 1ER deficiencies in compliance with 50.49. LAGRANGE believes it was related to GPU that the NRC wanted the submittal for a final

SER. LAGRANGE advised that the submittal was not used for a final SER and he believed that an audit would have been conducted no matter what the submittal looked like, if for no other reason, than to address the UCS petition.

End of Results of Interview with Bob LAGRANGE dictated on various dates between February 11 and March 26, 1985.

Reported By:

R. A. Matakas, Investigator Office of Investigations Field Office, Region I



Place: TMI-1

Date: April 9, 1985

STATEMENT

Mr. Richard A. MATAKAS, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I provided Mr. MATAKAS with this information on April 4, 1985 with no chreats having been made or promises having been extended to me.

As background information, I started with GPU in 1967 and in 1980, I became the Operations and Maintenance Director for Three Mile Island Nuclear Station, Unit 1. I have held this position until the present time. My current work address is GPU Nuclear Corporation, P. O. Box 480, Route 441 South, Middletown, Pennsylvania, 17057.

Mr. MATAKAS has shown me a GPU Nuclear document dated February 10, 1984 (GPUN Control No. 5211-84-2038), which was submitted to the NRC's Office of Nuclear Reactor Regulation and signed by me for Mr. Hank HUKILL, Director of TMI-1. 1 do recognize the document and the signature is my signature. When Mr. HUKILL is either out of town or offsite for some reason. I am authorized to sign in his absence. Since the document in question is an outgoing licensing correspondence, it requires Mr. HUKILL's signature. I have reviewed the document on this date and other than what the document says, I do not know for what purpose the response was being made. At this time, I do not specifically recall what consideration I gave before signing the document. Typically, 1 would see if it was understandable, and if there was any site commitments. Based on my background, I would look for its accuracy without going back over drawings, other related documents, or whatever. I would also look at the review chain and in this case, I probably would have noted that Paul LEVINE, Site Engineering, had previously reviewed and acknowledged the contents of the document. I normally review all correspondence that goes to Mr. HUKILL for his signature. In this particular case, the document refers to the environmental qualification program at TMI-1 which is a Headquarters, Parsippany

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Witechnical Functions responsibility and Mr. LEVINE was the Site Engineer who was knowledgeable in this area, and who would have reviewed the package. This letter would have been written by Licensing in Parsippany, New Jersey and sent to us for review.

As the Operations and Maintenance Director of TMI-1, my Section's responsibility in the area of environmental qualifications would be to replace components identified by Technical Functions as being unqualified with qualified components and document the replacement. This would be done under the direction of Technical Functions out of Parsippany. Neither I nor my direct subordinates have any input into the actual qualification of equipment. Again, that is handled by Technical Functions and we (my organization) are basically the implementing organization who does the actual changing or modification of components as directed by Technical Functions.

At Mr. MATAKAS's request, I have reviewed both the February 10, 1984 document (discussed above) and a related May 20, 1983 document (GPUN Control No. 5211-83-157) and was not aware at the time I signed the February 10 document, nor was I aware at the time I reviewed the May 20, 1983 document, that either document contained any false statements. When I signed the February 10, 1984 document, I believed that I knew there were things that remained to be done on some of the electrical equipment components important to safety which came under the purview of the environmental qualification program. For instance, on page 2 of Attachment 2 (Item B, Asco Solenoid Valves), the statement is made that "Asco Solenoids will be replaced with qualified Asco Solenoids by June 1984. Therefore, Asco qualification test reports AQR67368 and AQS21678/TR apply." In my mind, this refers to deficiencies that will be corrected in the future and this was somehow understood by the NRC. Mr. MATAKAS has pointed out to me that the February 10, 1984 document literally states, "It is GPUN's position that TMI-1 is currently in compliance with the environmental qualification rule 10 CFR 50.49 as applicable to TM:-1." Prior to my discussion with Mr. MATAKAS on this date, I did not understand what was being referred to as the material false statement in the February 10, 1984 letter. Prior to our discussion, I read the correspondence, as I did at the LT -3-

with Mr. MATAKAS on this date, I now understand the concern and I can see by the words in the February 10, 1984 document what the concern is; however, that is not how I interpreted the document when I signed it in February 1984. I did not interpret the statement to mean that all TER deficiencies had been connected. In retrospect, I can see into how the letter says we have done everything that needs to be done and that was not the case. As I have previously stated, it is obvious by reading the attachments to the February 10, 1984 letter that there was work that remained to be done concerning certain components within the scope of the environmental qualification program at TMI-1. However, it was my understanding at the time I signed the letter, that we had identified and committed to complete qualification prior to March 31, 1985.

Prior to signing the February 10, 1984 document, I had not reviewed the December 1982 NRC SER/TER. I would like to reiterate that when I signed the document in question, I did not recognize any information in the document as being false information or information that was intended to deceive the NRC in any manner.

I have read over this three-page statement and have discussed its contents with Mr. MATAKAS on the date reflected below my signature. I have had the opportunity to make all necessary corrections and additions and this statement is the truth to the best of my showledge and belief.

SIGNATURE

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Subscribed and swarm to before me this

day of April, 1985, at

INVESTIGATOR:

4-9-85

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Place: TMI-1

Date: April 9, 1385

STATEMENT

I, Henry Durbin HUKILL, Jr., hereby make the following voluntary statement to Richard A. MATAKAS who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I provided this information to MATAKAS on April 4, 1985 with no threats having been made or promises having been extended to me.

As background information, I started my employment with GPU in June 1980 and I have been the Director of Three Mile Island, Unit 1, since September 1980. My current work address is GPU Nuclear Corporation, P. O. Box 480, Route 441 South, Middletown, Pennsylvania, 17057.

Mr. MATAKAS has shown me two (2) GPU Nuclear documents addressed to the NRC's Office of Nuclear Reactor Regulation that were prepared for my signature. The first document is dated May 20, 1983 (GPUN Control No. 5211-83-157), and the second document is dated February 10, 1984 (GPUN Control No. 5211-84-2038). I recognize my signature on the May 20, 1983 document and my Operations and Maintenance Director, Ronald TOOLE, apparently signed the February 10, 1984 document for me. Mr. TOOLE is authorized to sign for me when I am either out of town or otherwise unavailable. In this particular case, I do not recall why Mr. TOOLE signed the February 10, 1984 document. The subject of both documents is the environmental qualification of electrical equipment at the Three Mile Island Nuclear Station, Unit 1. The primary responsibility for the area of environmental qualification at TMI-1 during which time both documents were signed was with the Lechnical Functions Section at Parsippany, New Jersey. However, hall outgoing licensing correspondence concerning TMI-1 is prepared for my signature as the Director of the Unit. I do not specifically recal' signing the May 20 document, and I do not specifically recall ever reviewing the February 10 document. However, it is my policy to readmevery document that is prepared for my signal re from cover to cover. Documents involving such things as license operator certifications (which I am deeply involved in), I would go over in much greater detail than I would a document

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such as the May 20. 1983 document, which would have been prepared under the direction of Technical Functions at GPUN Headquarters in Parsippany, New Jersey. In the former case, I would go over the document in much more detail 4 9 and would be more aware of the actual contents of the documentas to how statements were arrived at. Concerning the May 20, 1983 letter, I would have read the document to see who reviewed it, who concurred with it, and deformine if there was anything in the document that I did not agree with based on the knowledge that I had of the subject matter. To the best of my recollection, during the late 1983 and early 1984 time period, Jerry MAUS was more or less in charge of the environmental qualification program for TMI-1; however, I do not know if MAUS had any input into either the May 20 or February 10 letters. Prior to today's interview, Mr. Courtney SMYTH, the Site Licensing Manager, provided me with copies of the May 20, 1983 document in question and further provided me with various related review documents. Copies of the related documents are attached to this Statement and are identified as follows: Two correspondence project accountability check sheets (various dates) and two GPU Nuclear interoffice memoranda both dated May 16, 1983. The initials at the end of the May 20, 1963 document indicates that it was prepared for my signature by Mr. L. W. HARDING, Licensing, and the attached corresponde ce project accountability check sheets indicate that HARDING, R. J. CHISHOLM, Manager, Electrical Systems, and T. J. BROUGHTON, Systems Engineering Director, all had input into the contents of the May 20, 1983 document. Regarding my review of the May 20, 1983 document, as for technical content, I would have probably reviewed the correspondence project accountability check sheet and made sure that someone from Plant Engineering had reviewed and approved the document prior to my signature. In this case, the correspondence accountability project check sheet indicates that fir. C. HARTMAN, Plant Engineer, had reviewed and signed the document for his Supervisor, Mr. J. J. COLIIZ. I do littl not know specifically who at GPUN Headquarters in Parsippany, New Jersey, all ela.

reviewed the May 20, 1983 document. Like I have previously stated, t' TPUN Technical Functions, headed by R. F. WILSON, had the primary responsibility for the environmental qualification program at TMI-1 during the time but the May 20 and February 10 documents were drafted. To the best of my recollection, Mr. Paul LEVINE, Plant Engineering, would have at the time, been the site individual with the responsibility for following the environmental qualification program at the site level.

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I personally do not recall making comments on either submittal. At the time that I signed the May 20 letter, I was not aware that the components referred to under the heading Safety Related Electrical Equipment were not qualified in accordance with DOR guidelines dated November 1979 as stated in the document. As a result of the NRC Audit in, I believe 1984, I became aware that the NRC claimed that the TMI-I electrical equipment components were not in compliance with the DOR guidelines. I am also aware that subsequent GPUN internal audits made the same determination.

Basically, my involvement in the TMI-1 anvironmental qualification program has been through personal interaction and other communications (staff meetings and other meetings) with Mr. Dick WILSON who heads the GPUN Technical Functions Section. Up until either the NRC audit or the internal GPUN audits that I previously referred to, I was lead to believe that we were meeting the requirements of NRC regulations recording the environmental qualification program at TM1-1. Hat MATAKAS has shown me a GPUN interoffice memorandum dated June 25, 1981 the subject of which is Internal Audit 0-TMI-81-02 Technical Functions Home Office Activities for Compliance of IE Bulletin 79-01B. I do not recall being aware of the audit referred to in the above mentioned interoffice memorandum. Like I have previously stated, management involvement in the environmental qualification program was a Technical function's program. I was aware that the plant would be involved in the replacement of parts for those items designated by the En program for replacement after a certain lifetime. The environmental qualification program has been very confusing and difficult to implement. It is my understanding that it has been very hard to certify certain parts with vendors who are reluctant to do so or have tent but of business. These are some of the problems that have been related to me by the Technical Functions Group.

Basically. I would like to reiterate that I read basically every correspondence which I sign. For those areas that I am personally responsible, I personally get involved in the backup information pertaining to the document. For other types of documents, especially those involving technical issues, I will read the document and it's related review sheets to see if there is anything that I do not agree with and will base my signature on the approval list. I will have Mr. TOOLE, my Plant Manager, review and approve every document before it.

Plant Engineering Director, Mr. COLITZ (or his representative), has reviewed and approved the document. I also rely very heavily on Licensing for the accuracy of each document that I sign. If I have a significant question or concern on a technical matter contained in a document. I will request either Mr. WILSON, from Licensing, Mr. CRONEBERGER, Manager, Engineering and Design, it or Mr. KEATO, Manager of Systems Engineering, to concur with the contents of the document before I sign it. All three of the above mentioned individuals are Senior Technical Functions people. Concerning the May 20 document, I note on one of the correspondence project accountability check sheets that Mr. CRONEBERGER approved the final letter on May 17, 1983.

I have read over this four-page document on the date indicated below my signature and have had the opportunity to make the necessary changes and corrections. This statement is the truth to the best of my knowledge and belief.

SIGNATURE

E: Henry D Huthel

Subscribed and sworn to before me i is

day of April, 1985, at

INVESTIGATOR

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	Letter type:
	PRELIMINARY DRAFT - Please supply your initial comments and input for final document processing.
	PROPOSED FINAL DRAFT - Please review and return.
	Original material prepared by: L. W. Harding, R. J. Chisholm, T. G. Broughton
	Turnaround time requestes: Two (2) Days.
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