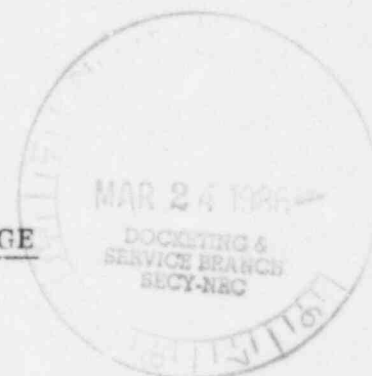


March 21, 1986

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ADMINISTRATIVE LAW JUDGE



In the Matter of )  
GENERAL PUBLIC UTILITIES NUCLEAR ) Docket No. 50-289 (CH)  
(Three Mile Island Nuclear Station, )  
Unit No. 1) )

NRC STAFF'S FIRST INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF  
DOCUMENTS TO CHARLES HUSTED

In accordance with 10 C.F.R. Sections 2.740, 2.740b and 2.741, the NRC staff hereby serves Charles Husted, a party in the above-captioned proceeding, with NRC Staff's First Set of Interrogatories and Document Requests to Charles Husted. These interrogatories and document requests relate to the seven factual issues admitted for litigation in this proceeding by the Presiding Officer in his Report and Order On Initial Prehearing Conference ("Order") dated February 27, 1986. Answers to the interrogatories and production of documents requested below are due within 14 days after service, in accordance with 10 C.F.R. § 2.740b and the Presiding Officer's Order, at 13.

You are requested to answer each interrogatory separately and fully in writing under oath or affirmation, and to include all pertinent information available to you, your agents, advisors, or counsel, based on the personal knowledge of the person answering.

By each request for production of documents, the NRC Staff seeks to inspect and copy pertinent documents which are in your possession,

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custody or control, or in the possession, custody or control of your advisors, agents, or counsel.

As used herein, "you" and "your" refers to Charles Husted; "Charles Husted" includes Charles Husted, his advisors, agents, employees, and counsel; "documents" refers to and includes any writings, drawings, graphs, charts, and schedules wherever located and however prepared, produced, transmitted, or stored; photographs or other pictorial representations; recordings and tapes, whether sound or visual; and data compilations of whatever form.

In answering each interrogatory: (1) Fully identify any documents which form the basis for your answer, or which relate to the subject of the interrogatory and upon which you intend to rely in establishing your position at hearing; (2) Give the name, address, occupation, and employer of the person or persons answering the interrogatory; (3) Identify each person, including his or her name, address, occupation and employer, whom you expect to call as a witness to testify as to the matter addressed in the pertinent interrogatory, together with the subject matter and substance of the testimony; (4) If the answer is based on oral or written communications with one or more individuals, identify each such individual, including his or her name, address, occupation, employer and professional background, describe the information received and its relation to the answer, and fully identify each writing or record documenting such communication.

You are also requested to supplement each interrogatory answer as necessary or appropriate in accordance with 10 C.F.R. § 2.740(e).

Interrogatories

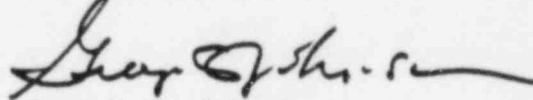
1. Please fully state your position on the first issue admitted for litigation in this proceeding -- your "alleged solicitation of an answer to an exam question from another operator during the April 1981 NRC written examination" at Three Mile Island Nuclear Station. Please include each and every fact on which you base your position on this issue.
2. Please fully state your position on the second issue admitted for litigation in this proceeding -- the alleged "lack of forthrightness of [your] testimony before the Special Master" in Metropolitan Edison Company (Three Mile Island Nuclear Station, Unit No. 1), Docket No. 50-289, v. December 10, 1981. Please include each and every fact on which you base your position on this issue.
3. Please fully state your position on the third issue admitted for litigation in this proceeding -- the question as to whether you exhibited a "poor attitude toward the hearing [before the Special Master] on the cheating incidents." Please include each and every fact on which you base your position on this issue.
4. Please fully state your position on the fourth issue admitted for litigation in this proceeding -- your alleged "lack of cooperation with NRC investigators" in interviews conducted on July 29, 1981, and September 18, 1981. Please include each and every fact on which you base your position on this issue.

5. With regard to the two admitted contentions of TMIA and the admitted contention of GPU, please fully state your position as to how your performance of your responsibilities with GPU and Metropolitan Edison Company reflect on your attitude and integrity. Please include each and every fact on which you base your position.
6. With regard to the two admitted contentions of TMIA and the admitted contention of GPU, please state your position as to whether any remedial action with respect to you is required. Please include each and every fact on which you base your position.
7. If, in response to Interrogatory 6, you believe that remedial action is warranted, please state the remedial action, and each and every fact on which you base your position.
8. With regard to the two admitted contentions of TMIA and the admitted contention of GPU, please describe any other information concerning your attitude, honesty, integrity, character, personality traits, activities, habits or reputation on which you intend to rely in addressing how considerations as to your attitude or integrity bear on your employment as an NEC-licensed operator, licensed-operator instructor or training supervisor, or supervisor of training of non-licensed personnel.

Documents Requests

Please make available for inspection and copying, at a time and location to be designated, any and all documents of whatever description identified in your answers to the above Staff interrogatories. If you maintain that some documents should not be made available for inspection, you should identify the document as to date, title, author, recipient, and subject matter, and explain why such documents are not being made available.

For the NRC Staff,

A handwritten signature in dark ink, appearing to read "George E. Johnson", written in a cursive style.

George E. Johnson  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 21st day of March, 1986

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

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BEFORE THE ADMINISTRATIVE LAW JUDGE

OFFICE OF THE SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	
	)	
GENERAL PUBLIC UTILITIES	)	Docket No. 50-289 (CH)
NUCLEAR	)	
	)	
(Three Mile Island Nuclear Station,	)	
Unit No. 1)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF RESPONSE TO TMIA'S REQUEST FOR AN EXTENSION OF TIME AND FOR A DELAY OF DISCOVERY" and "NRC STAFF'S FIRST INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO CHARLES HUSTED" 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, this 21st day of March, 1986:

\*Morton B. Margulies  
Administrative Law Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Louise Bradford  
Three Mile Island Alert  
1011 Green Street  
Harrisburg, PA 17120

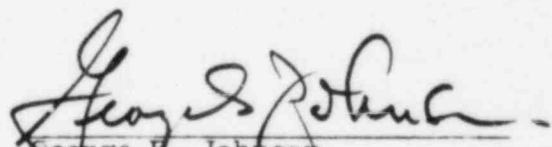
Michael W. Maupin, Esq.  
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U.S. Nuclear Regulatory Commission  
Washington, DC 20555

  
George F. Johnson  
Counsel for NRC Staff