

C. Where identification of a meeting, conversation, discussion or communication is required, the following shall be separately stated as to each such meeting, conversation, discussion or communication: the date, place, persons present or participating; the method of communication, whether oral or written; the identity of each participant; the substance of each person's participation; the substance or subject discussed or communicated; the purpose of the meeting or communication; the identity of any person who possesses information concerning such meeting, conversation, discussion or communication; the substance of any decision made at such meeting, discussion or conversation; any minutes, correspondence, notes, memoranda or other writing which resulted from or memorialized such meeting, discussion or conversation or communication, and the location of any such correspondence, notes, memoranda or other document.

D. Where identification of a document is required, state the following: its date; its exact title; the general subject matter of the document; the author and his/her affiliation, office or business, presently and at the time the document or correspondence was prepared; the last known address of every person to whom a copy of the document was to be sent, other than the addressee described above; the name and address of all persons who now have the original and/or copies; the identification and location of the files where the original and each copy is kept in the regular course of business and the custodian thereof; and whether the document will be made available for inspection and copying, and the site of such voluntary production.

E. If the Staff contends that the answer to any interrogatory is privileged, in whole or in part, or otherwise objects to any

interrogatory, state the reasons for each objection or grounds for exclusion, and identify each person having knowledge of the factual basis, if any, on which the privilege or other ground is asserted.

F. If an interrogatory could, at one time, have been answered by consulting documents which are no longer in existence, in answer to such interrogatory:

1. identify what information was maintained;
2. identify all documents which contained such information;
3. state the time period during which such documents were maintained;
4. state the circumstances under which documents ceased to exist;
5. state the date when such documents ceased to exist;
6. identify all persons having knowledge of the circumstances under which such documents ceased to exist; and
7. identify all persons who have knowledge or had knowledge of the documents and their contents.

G. As used herein and unless the context otherwise requires, the terms:

(i) "NRC" shall mean the Nuclear Regulatory Commission, its branches, departments, sections, offices, subdivisions, its present investigators, staff, consultants, contractors, attorneys, employees, agents, representatives and accountants, or their agents, attorneys and representatives.

(ii) "General Public Utilities" or "GPU" shall mean General Public Utilities, any of its subsidiaries, including but not limited to GPU Nuclear Corporation and Metropolitan Edison Company, it or its subsidiaries, branches, divisions, departments, sections, affiliates, offices, present and former officers, directors, management, board of directors, employees, staff, officials, agents, consultants, attorneys, representatives or their attorneys, representatives and agents.

(iii) "Document" shall mean every writing of every type and description, and every other instrument or device by which, through which or on which information has been recorded and/or preserved, including but not limited to memoranda, including those reflecting meetings, discussions or conversations, notes, letters, drawings, files, graphs, charts, maps, photographs, deeds, agreements, contracts, handwritten notes, diaries, logs, ledgers, studies, data sheets, notebooks, books, appointment calendars, telephone bills, telephone messages, receipts, vouchers, minutes of meetings, pamphlets, computations, calculations, accounting(s), financial statements, voice recordings, computer printouts, computer discs and programs, and other data compilations, device or media on which or through which information of any type is transmitted, recorded or preserved. The term "document" also means every copy of a document when such copy is not an identical duplicate of the original.

(iv) "Person" shall refer to any natural person, firm, partnership, joint venture, trust, corporation, holding company, or any other entity natural or legal, domestic or foreign.

(v) "Communication" shall mean communication, discussion, conversation, contact, letter, memorandum, telephone call, telegram, message or direction, whether written or oral, and whether in person, by telephone or by mail.

H. When an interrogatory requests the identification of an individual or entity, set forth the following information as applicable:

1. full name;
2. present or last known address;
3. present or last known telephone number;
4. present occupation, job title and employer; and
5. occupation, job title and employer at the time of the event or period referred to in each particular interrogatory.

INTERROGATORIES.

1. Identify the Office of Inspection and Enforcement (OIE) investigator(s) who interviewed Charles Husted on July 29, 1981.
2. Identify all persons present during Husted's interview.
3. Where did the interview take place?
4. How long did the interview last?
5. Did the investigator(s) who interviewed Husted take notes of the interview?
6. Was the interview taped?
7. Did the investigator(s) who interviewed Husted prepare the report which appears at Page 39 of the Report of Investigation dated August 11, 1981?
 - a. If the answer to Interrogatory No. 7 is no, identify the person(s) who prepared the report.

8. Were drafts of the Report of Investigation submitted for comment or editing prior to the issuance of the final report?

a. If the answer to Interrogatory No. 8 is yes, identify all persons who commented on or who edited drafts of the report.

9. Was any portion of the investigator(s) initial draft of the Husted interview omitted from the final report? If your answer is yes;

a. What was omitted from the final report?

b. Identify the person(s) who authorized the omissions.

c. State the reasons for the omissions.

10. After the July 29, 1981 interview of Husted and prior to drafting the report of that interview, did the investigator(s) consult with other OIE staff or with NRC legal staff concerning what information should be included in the report? If your answer is yes;

a. With whom did the investigator(s) consult?

b. What advice was provided?

c. How was the report changed as a result of the consultation?

11. State specifically the questions that were put to Husted during the July 29, 1981 interview.

12. State specifically his answers to the questions asked in the interview.

13. During the July 29, 1981 interview, did Husted appear to be confused by the investigator(s)' questions?

14. Did Husted request clarification of any of the questions put to him?

15. If Husted requested clarification, did the investigator(s) supply clarification?
16. Did Husted appear to understand the questions as clarified?
17. Did Husted request permission not to respond to the investigator(s)' questions?
18. Did Husted offer an explanation for not responding to investigator(s)' questions?
19. If you have answered yes to Interrogatory No. 18, state Husted's explanation.
20. Which questions caused Husted to be confused?
21. Which questions did Husted decline to answer?
22. If Husted requested permission to not respond to investigator(s)' questions, explain why that information did not appear in the final report of the interview.
23. Did the investigator(s) take notes during the interview?
24. If you have answered yes to Interrogatory No. 23, how extensive were the investigator(s)' notes?
25. How soon after the July 29, 1981 interview of Husted was the first draft of the report written?
26. Did Husted request that Paul G. Christman be present during the July 29, 1981 interview?
27. If you have answered yes to Interrogatory No. 26, when did Husted make the request?
28. If you have answered yes to Interrogatory No. 26, did Husted explain why he wanted Christman present during the interview?

29. If you have answered yes to Interrogatory No. 28 state Husted's reason for wanting Christman present.
30. Did Christman say anything during the interview?
31. If you have answered yes to Interrogatory No. 30, what did Christman say?
32. Did the investigator(s) inform Husted of his right to have counsel present during his interview?
33. Describe Husted's demeanor during the interview.
34. Did the investigator(s) agree that the report of Husted's July 29, 1981 interview, which appears at Page 39 of the August 11, 1981 Report of Investigation, was accurate and complete?
35. If you have answered no to Interrogatory No. 34, state the name of the person(s) who disagree.
36. If you have answered no to Interrogatory No. 34, state the areas of disagreement.
37. Identify all persons involved in the decision to re-interview Husted.
38. Identify all persons present during the September 18, 1981 interview of Husted.
39. Identify the investigator(s) who conducted the September 18, 1981 interview of Husted.
40. How long did the September 18, 1981 interview last?
41. Was the September 18, 1981 interview taped?
42. Did the investigator(s) who interviewed Husted on September 18, 1981 take notes of the interview?
43. Did the investigator(s) who interviewed Husted on September 18, 1981 prepare the report which appears at Page 16 of the investigative report designated Staff Exhibit 27 in the reopened

hearing on cheating?

44. If the answer to Interrogatory No. 43 is no, identify the person(s) who prepared the report.

45. Were drafts of Staff Exhibit 27 submitted for comment or editing prior to the issuance of the final report?

46. If the answer to Interrogatory No. 45 is yes, identify all persons who commented on or who edited drafts of Staff Exhibit 27.

47. Was any portion of the investigator(s)' initial draft of the September 18, 1981 Husted interview omitted from the final report? If your answer is yes;

a. What was omitted from the final report?

b. Identify the person(s) who authorized the omissions.

c. State the reasons for the omissions.

48. After the September 18, 1981 interview of Husted and prior to drafting the report of that interview, did the investigator(s) consult with other OIE staff or with NRC legal staff concerning what information should be included in the report? If your answer is yes;

a. With whom did the investigator(s) consult?

b. What advice was provided?

c. How was the report changed as a result of the consultation?

49. State specifically the questions that were put to Husted during the September 18, 1981 interview.

50. State specifically his answers to the questions asked in the September 18, 1981 interview.

51. Did Husted volunteer the information about "passing papers during the exam"?

52. Did Husted state why he had not supplied the information concerning passing papers during his July 29, 1981 interview?

53. If the answer to No. 52 is yes, state the explanation Husted gave for not supplying the information during the earlier interview.

54. Did the investigator(s) share Husted's opinion that the questions asked by investigator(s) during the July 29, 1981 interview were too broad to be answered specifically?

55. During his testimony before the Special Master, William J. Ward stated that it was his opinion and the opinion of the investigator(s) who interviewed Husted, that Husted was not being truthful when he stated that he did not recall who made the statement about "passing papers in the exam." Is Ward's statement an accurate recounting of the investigator(s)' opinion(s)?

56. If the investigator(s) share Ward's opinion regarding the veracity of Husted's statement, state the basis for their opinion.

57. Did the investigator(s) indicate to Husted the fact that they did not believe his statement?

58. Did the investigator(s) advise Husted at any time that his lack of cooperation with the NRC investigation might affect his operating license?

59. Describe Husted's demeanor during the September 18, 1981 interview.

60. During testimony before the Special Master, Mr. Ward revealed that investigators had received testimony from Mr. P in which Mr. P alleged that Husted had made an unsuccessful attempt to cheat during the SRO portion of the April 1981 NRC licensing exam.

a. Explain why this allegation does not appear in Staff Exhibit 27.

b. Identify all persons who were involved in the decision to omit the allegation from Staff Exhibit 27.

61. Identify all persons present during the September 25, 1981 interview of Mr. P.

62. Did the investigators take notes of the interview of Mr. P?

63. Was the interview of Mr. P taped?

64. State specifically the questions which led to Mr. P's revelation of Husted's attempt to cheat.

65. State specifically Mr. P's responses to the questions concerning Husted's attempt to cheat.

66. Did Mr. P appear confused by the questions?

67. Did Mr. P request clarification of the questions?

68. How long did the interview with Mr. P last?

69. Did any of the investigators indicate to Mr. P that they were not interested in whether Husted had attempted to cheat?

70. Did all of the investigators remain in the room continuously throughout the interview of Mr. P?

71. If the answer to Interrogatory No. 70 is no, identify the investigators who left the interview room and the duration of their absence.

72. Identify any and all investigators who remained in the interview room continuously throughout the interview of Mr. P.

73. Did all of the investigators take notes of the interview of Mr. P?

74. Did all of the investigators who participated in the interview of Mr. P have input into the final report?

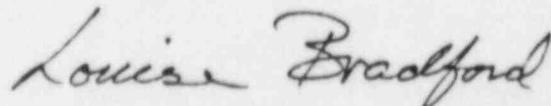
75. Did all of the investigators who participated in the interview of Mr. P agree that the final report accurately reflected the actual interview?

76. Identify any and all investigators who participated in the interview of Mr. P and who did not agree that the final report was an accurate representation of the interview.

DOCUMENTS REQUESTS.

Please provide any and all documents of whatever description, identified in your answers to the above TMIA 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.

Respectfully submitted,



Louise Bradford
for Three Mile Island Alert, Inc.

April 8, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "TMIA'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND FIRST INTERROGATORIES TO THE NUCLEAR REGULATORY COMMISSION STAFF" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 8th day of April, 1986:

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