

March 24, 1986

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RELATED CORRESPONDENCE

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 GPU NUCLEAR CORPORATION

In accordance with 10 C.F.R. Sections 2.740, 2.740b and 2.741, the NRC staff hereby serves GPU Nuclear Corporation, a party in the above-captioned proceeding, with NRC Staff's First Set of Interrogatories and Document Requests to GPU Nuclear Corporation. 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 employees, 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 employees, advisors, agents, or counsel.

As used herein, "you" and "your" refers to GPU Nuclear Corporation; "GPU Nuclear Corporation" means intervenor GPU Nuclear Corporation, its officers, agents, and employees, and all other persons who act or have acted on behalf of GPU Nuclear Corporation; "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 as to whether Charles Husted solicited an answer to an exam question from another operator during the April 1981 NRC SRO examination at Three Mile Island Nuclear Station, including each and every fact on which you base your position.
2. Please fully state your position as to whether the testimony of Charles Husted before the Special Master on December 10, 1981 in Metropolitan Edison Company (Three Mile Island Nuclear Station, Unit No. 1), Docket No. 50-289, lacked forthrightness, including each and every fact on which you base your position.
3. Please fully state your position as to whether Charles Husted exhibited a poor attitude toward the hearing before the Special Master on the cheating incidents, including each and every fact on which you base your position.
4.
 - a. Please fully state your position as to whether Charles Husted failed to cooperate with NRC investigators in interviews of Mr. Husted conducted on July 29, 1981, and September 18, 1981, including each and every fact on which you base your position.
 - b. With respect to each of the interviews referred to in 4.a., please identify any note, memorandum, transcription, tape, or other record of said interviews; and please identify any

employee, advisor, agent, or counsel of GPU Nuclear Corporation who was present at either interview.

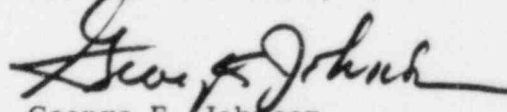
- c. If any persons are identified in response to 4.b., above, please describe the substance of such person or persons' recollection of said interview or interviews.
5. Please fully state your position as to how the performance of Charles Husted in his responsibilities with GPU and Metropolitan Edison Company reflects on Mr. Husted's attitude and integrity, including each and every fact on which you base your position.
6. Please state your position as to whether any remedial action with respect to Charles Husted is required, including each and every fact on which you base your position.
7. If your position is that remedial action is required with respect to Mr. Husted, please state the remedial action you believe to be necessary, and each and every fact on which you base your position.
8. a. Please identify any information concerning the conduct, performance, attitude, or integrity of Charles Husted, which was considered in deciding whether to enter into the stipulation of July 23, 1983, with the Commonwealth of Pennsylvania.

- b. Please identify any documents addressing the conduct, performance, attitude or integrity of Charles Husted which were prepared, transmitted, or received in connection with your decision whether to enter into the Stipulation referred to in 8a.
9. Please describe any other information with respect to Charles Husted's attitude, honesty, integrity, character, personality traits, activities, habits or reputation on which you intend to rely in addressing how considerations of Mr. Husted's attitude or integrity bear on his employment as an NRC-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,



George E. Johnson
Counsel for NRC Staff

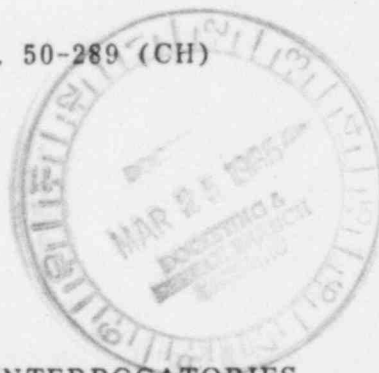
Dated at Bethesda, Maryland
this 24th day of March, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ADMINISTRATIVE LAW JUDGE

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

Docket No. 50-289 (CH)



CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S FIRST INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO THREE MILE ISLAND ALERT" and "NRC STAFF'S FIRST INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO GPU NUCLEAR CORPORATION" 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 24th 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

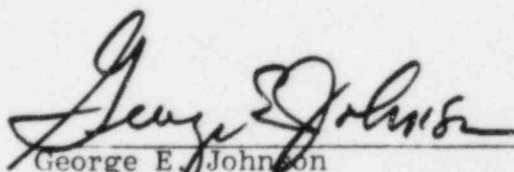
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George E. Johnson
Counsel for NRC Staff