

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))

TESTIMONY OF
NELSON D. BROWN

My name is Nelson D. Brown. I am employed as a Senior Emergency Planner with GPU Nuclear Corporation. I worked in the Three Mile Island Training Department from June 1975 until March 1983, when I assumed my current position. In July 1978, when Charles Husted joined the Training Department, I was an instructor in the Licensed Operator Training section. Mr. Husted joined the Department as an instructor in the Non-licensed Operator Training section. In September 1980, I became Supervisor, Licensed Operator Training, and Mr. Husted became an instructor in Licensed Operator Training. From that time until I assumed my present position, I was

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Mr. Husted's immediate supervisor. During 1981 and 1982, when the O and W cheating episode and ensuing investigation and hearings occurred, I worked closely with Mr. Husted. I considered us to be friends, although we were not close and had little social contact.

In this testimony I will first describe the effects of the cheating episode on the Training Department generally and on Mr. Husted in particular. I will then describe my own evaluations of Mr. Husted's performance as an instructor, his attitudes toward nuclear safety and the regulatory process, and his integrity.

1. The Post-Accident Environment in Training

The accident at TMI Unit 2, which occurred on March 28, 1979, resulted in a substantial increase in the demands placed on the Training Department.

Before the accident, the primary focus of the Licensed Operator Training group was requalification training -- the continuing education program required in order to maintain an NRC operator's license. Requalification training for reactor operators (ROs)

and for senior reactor operators (SROs) consisted primarily of classroom training. In addition, the Training Department taught new or replacement operators so that they would be in a position to take an NRC license examination. This process, however, involved a limited number of individuals at any given time (e.g., 3 or 4), and consisted principally of on-the-job training (OJT). The OJT program was well established at TMI, and so the instructors' work load in the replacement program consisted largely of the two subjects taught in the classroom -- reactor theory and the integrated control system -- and the oral and written examinations that were a part of the replacement operator program.

After the TMI-2 accident, the work load placed on members of the Training Department increased dramatically. Requalification training of all licensed operators continued; however, the substantive requirements for the program changed, which required new training materials, and became much more detailed in certain subjects, which also required new training materials. Plant modifications at TMI-1 and TMI-2 also resulted in changes in the training

program. In addition, the Training Department adopted more stringent requirements for lesson plan preparation and supervisory review, which increased instructor work and also required that more time be built into the schedule to allow for review. In the replacement operator program, the extent of classroom training was significantly increased, from about a two week demand for each group of applicants to about nine weeks of classroom training. Once again, this change in the program increased the demands on the instructors.

The heavy preparation and teaching requirements were made more difficult by the fact that many of our files had been removed as a result of discovery requests made in connection with the numerous post-accident hearings and investigations. We had to recreate many documents customarily used in teaching, as well as modify available training materials. Of course, in addition to our heavy training responsibilities, those of us in the Training Department who held licenses, which included me, Mr. Boltz and Mr. Husted, had to maintain our licenses through the

requalification training program and had to prepare to take the April, 1981 NRC examinations.

Finally, I should note that there were a number of special training programs which also occupied our time during this time frame. The Operator Accelerated Retraining Program (OARP), conducted in 1980, was a special one-time intensive training program for the operators which required extensive preparations by us. There were other programs as well, such as special training sessions in mitigating core damage.

2. The Post-Cheating Environment in Training

During the April 1981 NRC examinations, of course, the O and W cheating incident occurred. This development placed substantial additional pressures on the Training Department. We had to continue with the training of replacement operators (RO), the SRO training of RO's and the requalification training of operators already licensed. With the announcement that we would have to take NRC examinations again, morale was very low. The implication of this requirement, as many of us saw it, was that we were

all suspected of cheating on the April, 1981 examinations. The requirement also meant that many of us in training would again have to prepare and implement special training programs in connection with the forthcoming NRC examinations. We also would have to retake the examinations ourselves.

In addition, the April cheating produced a period of intensive self-examination in the Training Department. Among other things, this introspective effort produced a new procedure on the administration of exams, which was written to require stringent control of examination preparation and administration, including proctoring. Of course, this requirement also increased the work load of members of the Training Department. Additionally, we were faced with new hearings, new discovery requests, and new requirements to produce testimony.

In addition to these physical demands, the cheating episode had emotional effects within the Training Department. I have mentioned the adverse effect on morale of the NRC's requirement that we retake the NRC examinations. The ensuing NRC investigation also caused a great deal of

apprehension and resentment among licensed personnel at TMI. Many of us felt that our personal integrity was being questioned, and we did not like it.

My own view is that the effects of stress associated with the O and W cheating episode and its aftermath were noticeable on Mr. Husted. I can best explain this by describing a personal experience. When the accident at TMI Unit 2 occurred in 1979 I had been teaching the Company's operators for four years. The accident had a devastating effect on me. I spent months of soul-searching in an effort to come to grips with the questions of whether (1) I had taught as effectively as I could and (2) I had some responsibility for the accident. I made peace with myself, in connection with the accident, concluding that I had done my job well. When the accident occurred Mr. Husted had been in the Training Department for less than a year, and had been teaching primarily auxiliary, not licensed, operators. I do not believe that the accident affected him as adversely as it did me, because he did not yet have a long association with the training of licensed operators.

While I regretted the cheating that occurred, I did not suffer any significant self-doubt because of it. I certainly recognized the seriousness of the cheating, but I was able to approach it somewhat dispassionately as a problem whose repetition should be avoided. Mr. Husted, on the other hand, had been an instructor for nearly three years when the cheating occurred, and it is my view that on account of it he went through something very much like what I had gone through as a result of the accident. I believe he questioned his responsibility as an instructor for the cheating that occurred. I think he also resented, as I did, what he saw as the challenge to his personal integrity that the cheating investigation raised. And, of course, he was actually accused during the hearing, without any prior notice of the accusation, of having attempted to cheat on the April examinations. From my perspective, he behaved differently for several months after the cheating episode. Prior to the cheating he was relatively easy going; it was difficult to upset him. For several months after the cheating episode, he was more difficult to talk with. During periods of high

stress, while his performance remained highly professional, on a personal level he tended to be curt and sensitive to criticism. He appeared to be very upset and under a great deal of stress.

By the July 1982 Evaluation, discussed below, Mr. Husted's enthusiasm and morale had begun to improve. More recently I have had occasions to work with him from time to time in my present job. He is much more like the man I knew prior to the cheating episode, if anything even more self-confident and under less stress than he was before the O and W cheating incident.

3. Husted's Job Performance

As I said, I became Mr. Husted's immediate supervisor in September 1980. Because he had been in Non-licensed Operator Training prior to September 1980, reporting to Frank McCormick, I did not prepare Mr. Husted's evaluation for 1980. My first formal evaluation of Mr. Husted's performance was the 1981 evaluation. When I set out to perform the evaluation, I did three things. First, I gave Mr. Husted an Employee Performance Evaluation form

and asked him to evaluate his own performance. Second, I jotted down on an Employee Performance Evaluation form in each of 18 Evaluation Categories my immediate comments and ratings of Husted's performance. These initial comments and ratings were based on what first came to mind about his performance. Third, after receiving and considering his comments I made a systematic effort to review and evaluate his performance over the course of the entire year 1981; in connection with this step, I believe I reviewed lesson plans and exams prepared by him during the year and other material I considered appropriate. Based on this review, I created another set of ratings in the 18 Evaluation Categories. I then entered all three sets of ratings -- my two and the one Mr. Husted had prepared -- on an Employee Performance Evaluation form. The resulting document was a working draft. I shall refer to it as the "1981 Draft." It consists of two pages, the first entitled Employee Performance Evaluation and the second containing 17 numbered comments, an "OVERALL" comment and a footnote marked by an asterisk, which was not written by me. On the first page are three sets of

ratings in each Evaluation Category. The three sets are marked "0", "1/" and " 2 " respectively. I believe that two of the ratings are mine and represent the short term and the more systematic ratings I prepared. The third set consists of Mr. Husted's self-evaluation. I do not recall which set is which.

Let me summarize the comments I made on the second page of the 1981 Draft that might be viewed as adverse. Items 1 and 14 reflect my view that Mr. Husted tended to resist changes in the Department's way of doing things. I should add, though, that once a change became fact, he complied with it. For example, once the requirement for more formalized lesson plans was in place I never had any complaint about the lesson plans prepared by Mr. Husted. Items 2 and 3 indicate my view that Mr. Husted showed less interest in some assignments than in others. All of us have some jobs we like less than others; I believe, however, that it is an asset for an instructor to show a high level of enthusiasm for all assignments, whether or not he likes them. Items 4 and 10 reflect the results of the

post-cheating stress that was affecting Mr. Husted. Items 6, 7, 9, 12 and 17 all reflect my concern about his getting "sidetracked." My concern stemmed from the need to ensure that the Training Department was producing a quality product in a timely manner in accordance with all of the requirements under which we now operated. I was well aware of and, in fact, felt pressure from the deluge of work we were experiencing in this time frame. For example, if a new class was scheduled for 3 weeks away, I was very conscious of the need for lesson plans to be reviewed by me and other supervisors in 1 or 1-1/2 weeks. In short, the instructor did not have the full 3 weeks he was accustomed to.

I also want to stress the positive side of the evaluation. Note that under Item 3, I referred to Husted's professional attitude as being "generally good;" I believe that was remarkable given the "adverse conditions" I referred to in Item 10 and have described above. Indeed, I pointed out in Item 6 that he made it through the "hard times." (In connection with his attitude, my comment under Item 15 makes no sense to me today since that Evaluation

Category is "Development of Subordinates," and Mr. Husted had no subordinates.) I also commented that he showed creativity, demonstrated interest in self improvement, and showed analytical ability.

I should also call attention to the final version of Mr. Husted's 1981 evaluation, which I shall call the "1981 Evaluation" in this testimony. It is on the same form as the 1981 Draft, but it is signed by me and Messrs. Newton, Knief, Long and Husted. Note that the form permits ratings from "1" to "9". A "5" was the rating to be assigned to average performance, which meant acceptable performance of the job requirements. Mr. Husted received no ratings below "5" and received nine ratings above "5." In addition, while I commented on the post-cheating effects on Mr. Husted's attitude I also commented on his efforts to overcome those effects. All in all, I considered the 1981 Evaluation to be a favorable evaluation.

The next Husted evaluation I am aware of was performed in July 1982 in connection with a potential salary increase. I shall call this evaluation the "July 1982 Evaluation." The July 1982 Evaluation was

filled out by Mr. Newton. I cannot remember why he did so instead of me. But I signed the evaluation, which indicates that I approved of it. This evaluation is done on the same form as the 1981 Evaluation and shows ratings that are, with only two exceptions, "6's" or better. In particular, it awards a "7" for professional attitude, and it notes an "improvement in his enthusiasm and morale." This is a very favorable evaluation.

With the 1982 annual evaluation the Company went to a new form. It contained only six rating levels and "3" was the average. It also required two sets of ratings, one for Performance Factors that applied to every employee in the Company and one for Accountabilities that dealt with a particular employee's job assignments. I will call this evaluation, which I prepared, the 1982 Annual Evaluation. It reflects five Performance Factor ratings of "3," five of "4" and two of "5." Under Accountabilities, Mr. Husted received one "3," two "4's", and five "5's." I also highlighted under "Supervisor Comments" Mr. Husted's "attitude of quality."

I performed my final evaluation of Mr. Husted, which I call the March 1983 Evaluation, in March 1983 in connection with his promotion to Supervisor, Non-licensed Operator Training. The March 1983 Evaluation was also extremely favorable to Mr. Husted. By the time I left Training, I considered Mr. Husted an excellent operator and an excellent instructor.

I would add the following thoughts to what I have said about Mr. Husted. He was conscientious. He insisted on high quality in his own work. He insisted that students receive the best information they could be given. He was conscious of the importance of safety. I know this based on having served with him on-shift in the control room where he monitored the control room instrumentation frequently. Evidence of my confidence in his meticulous attention to safety was my assignment to him of the responsibility to teach courses on engineered safeguards and to keep track of and to teach the courses on the nature and significance of Unit 1 and Unit 2 plant modifications. I have monitored his teaching and have been a student in his

classes. I have never heard of or seen any activity on his part that reflected a disregard for safety. In particular, I have never heard any suggestion that he might have given his students any cause to disregard safety or take safety concerns lightly. I also have never known him to do or say anything to his students that might reflect disregard or disrespect for the nuclear regulatory process or for examination requirements. Based on my professional experience with Mr. Husted, I consider him to be an honest man.

4. Conclusion

In summary, based on my personal knowledge of Mr. Husted and my experience with him, and based on my knowledge of the training process and its requirements, I know of nothing about Mr. Husted's attitude or integrity that should disqualify him to serve in any position for which he is technically qualified, including as a licensed operator, licensed operator instructor, or supervisor of licensed or non-licensed operator training.