

June 1, 1987

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Administrative Law Judge

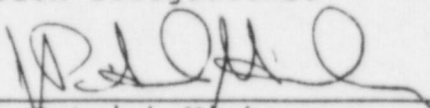
In the Matter of	)	
	)	
GPU Nuclear Corporation	)	Docket No. 50-320
	)	EA-84-137
(Three Mile Island Nuclear	)	
Station, Unit No. 2)	)	

NOTICE OF DEPOSITION OF RICHARD D. PARKS

Pursuant to 10 C.F.R. § 2.740(a), Richard D. Parks is hereby given notice that he should appear at the offices of Thelen, Marrin, Johnson and Bridges, 4100 MacArthur Boulevard, Suite 300, Newport Beach, California 92660, at 9:30 a.m. on Monday, June 22, 1987, to give testimony by deposition upon oral examination. The deposition will be conducted before a notary public or an officer by law to take depositions where taken. The oral examination will continue from day to day until completed. Each subsequent day of testimony will begin at 9:30 a.m. and be adjourned at 6:00 p.m. until the next morning.

Mr. Parks will be examined concerning his allegations and activities relating to TMI-2 and the investigations of those allegations. Mr. Parks is further instructed to bring to the deposition all notes, memoranda, files, and documents (including the spiral notebook(s) from which the attached four pages were taken) in his possession, custody or control, other than those documents

already provided to Bechtel Power Corporation on March 10, 1986,
that relate to Mr. Parks allegations, or investigation of, inquiry
into, or evaluation of such allegations.


A handwritten signature in dark ink, appearing to read "J. Patrick Hickey", is written over a horizontal line.

J. Patrick Hickey

SHAW, PITTMAN, POTTS & TROWBRIDGE

Counsel for GPU Nuclear Corporation

Dated: June 1, 1987

3/3/83

B. Kelly MTC - nothing accomplished
scheduled for 3/4 @ 1300

MTC with MTC by Pk Bop because
5 Ten Hook/Huist.

NOTE: 5 Ten Hook worked on
earlier - no Retest

3/3/83 - Pk Presentation "Dry Run"

Sat 3/12 @ 9:30 Presentation

Editor	Hansen	MR	Freeman
Larson	Radcliff	Security	
Twining	Seaborn	Clements	
Bedard	Wardlaw	Kaganas	

- agenda -

Design & Tech Approach to Crane
(Kyparis, Jupp, etc.)

- why the Spanish program dwindled down to
present level (one 5-6 Mill original program)

Deviated from original to present
by Kansas orders. Not always with
technical justification for why
conducted in process - cost,
ANCA, Time, etc.

Spare parts - long lead time defined
- do > 24 hrs.

- not all parts on hand
- not all parts on hand for load test.

- Auto list based on Manning Catalog, experience, and long lead times

SEER -

load drop, path, consequences

① Think to a good crane

② Feasibility for load drop low

③ Consequences are acceptable

Most possible is an industrial safety accident

Generic SEER Heavy Tool Drop

no progress yet - in process of generating mini-SEER for every load lifted

should have Generic SEER

why load test fixture not load tested?
and other items that are not load tested
(lifting, etc.)

QA/QC Requirements

why & why not

① Structured & Heuristic but not Cable in QA/QC Scope

② Made performed not under Site Design Doc. How did SABC Eng. Evaluate this. Changed in field outside of Eng. Package.

- not follow any site procedures

- results same cases "accept as is"

- did DE buy into resolution

- DE review work packages prior to implement. only review inspection reports on block-end. After review imp reports go to Bureau & NRC

- 1406 OP Quals

Phy. Quals, Specific TAN.

10 Qualified, covered 146 Taps, 4 Taps or

More log left - 24 by end of month

Wed. morning next MTC.

POLAR CRANE

2/28/83

READINESS REVIEW COMMITTEE

TO P.E. ESTABLISHED
ARNOLD, BARTON, LUNG, HEWARD, ETC..

NEED OPERATING PROCEDURE

HOLD POINT - PRIOR TO
LIFTING INDEXING FIXTURE

SLIP - HOW DOES IT AFFECT
DEPRESSURIZING THE PRIMARY?
THIS COULD BE A PROBLEM.

PRESENTATION TO REVIEW PANEL

1. ENG - HOW & WHY (280811)
2. SER - all encompassing (NANSEN.)

INTERNAL REVIEW OF ACTION STATEMENTS

RELATED ISSUES PRESENTATION

SUGGESTED NO USE CRANE TILL QC DONE

QA/QC INVOLVEMENT - WHY LIMITED.

NRC REVIEW & INVESTIGATION OF SER

PROC - OP / TRAINING - RAOH11 / SIGHT2

SER GOOD ONLY FOR HAND LIFT

NEED SER FOR MIX. CRANE USE & HEAVY LOAD

SERVICE

TURNOVER STRATEGY

CRANE OPERATOR SHIELDING LONG RANGE

ALARA program for P/C

CASUALTY PROCEDURE - Schlitz
POLAR CRANE RISK ASSESSMENT

PREMEETING - Thursday...

Get w/ PASTOR ON NEW ITEMS

Rigging NOT Load Tested - Shays, 2g etc

per ENGINEER. Decision

Why Testing NOT done

SPARE PARTS STATUS - ORDERED

1. MARCH 14th RESUME WORK FOR
LOAD TEST FIXTURE

MARCH ~~15th~~ ^{16th} TARGET DATE FOR
PRESENTATION - 11th FOR THEIR
APPROVAL.

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CERTIFICATE OF SERVICE

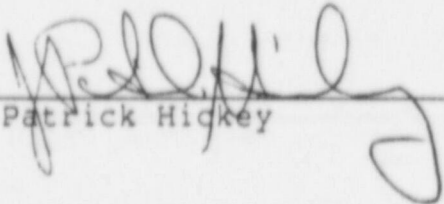
I hereby certify that copies of the foregoing "Notice of Deposition of Richard D. Parks" were served by deposit in the United States Mail, First Class, postage prepaid, or where indicated by an asterisk by hand delivery, this 1st day of June, 1987, to the following persons:

Ivan Smith, Esquire
Administrative Law Judge
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Branch
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Stephen T. Cox, Esq.
Hoberg, Finger, Brown, Cox & Molligan, P.C.
703 Market Street
Suite 1800
San Francisco, CA 94103

*George E. Johnson, Esquire
Office of the General Counsel
9604 MNBB
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



J. Patrick Hickey

Dated: June 1, 1987