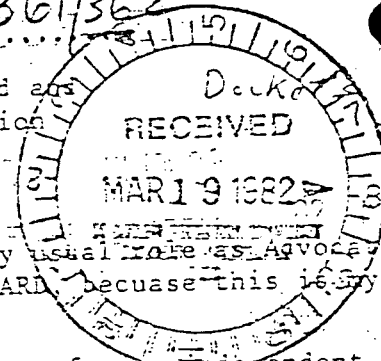


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3/12/82

Atomic Safety and Licensing Appeal Board
United States Nuclear Regulatory Commission
Washington, D.C. 20555



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Dear Officials:

I write as a concerned citizen, not in my usual role as Advocate for southern California environmental organization GUARD, because this is my response, opinions and recommendations.

Yesterday's news report of your requirement for an independent audit of Diablo construction evokes this letter of commendation. I am grateful and relieved by your demonstration of your commitment to public safety and your courage in face of tremendous utility company, nuclear industry, and government pressures to hasten Diablo licensing. You have renewed my hope that similar careful scrutiny may be obtained for San Onofre Unit II, since it, similar to Diablo, suffered misaligned reactor vessel installation and is in an area of critical seismic uncertainty.

Your recent identification of inadequate reactor vessel barrel support, due to the misalignment, may be only one of many design errors at San Onofre. Please provide an independent audit of reactor planning and construction of San Onofre II before you allow the testing operations of the utility to "go critical".

In recent years, since my address is that given to the public for communication to GUARD, I have received written and oral communications from San Onofre II project workers whose concern about safety carelessness...and in some cases guilt for their own shortcomings, has caused them to contact me. I have urged them to make their appeals to the Nuclear Regulatory Commission, but I doubt that any followed through. Several went so far as to come to my home to talk with me, but in all cases the overbearing concern was their need to protect their jobs and their future employment in the fields for which they had been trained.

Although the carelessness and mismanagement they reported would be difficult to prove, the young men who came to me were intelligent, conscientious, clean-cut types. In their messages to me, I found no cause for question of their integrity, and I am convinced that their warnings should be heeded by those with authority to examine and test quality of work performed.

Over the past several years, four engineers...one in quality control and one in high position of operational responsibility, three welders, a pipe fitter and three maintenance persons have come to us. This is a small number of the thousands working at San Onofre, but I believe they must not be ignored.

The focus of inadequacy seemed to be the night shift, with a range from carelessness to outright instruction from superiors advising that adherence to specifications was not necessary in certain instances...and lax supervision to the extent that safety critical work was reportedly done by some who were under the influence of drugs.

The quality control engineer expressed concern that more direct NRC surveillance is needed, that company employed inspectors are too subject to cost and time pressures exerted by their colleagues.

The most recent communication cited some specifics: "there are numerous arc strikes on thin-wall stainless that have been preened over, filed and flapper-wheeled polished to obscure them. Also there was trouble with galvanization in one of the areas I worked. Penetrations between buildings and anchored pipes spanning two buildings should be checked, as should fabrication of hangers and placement as to weldability (i.e. hanger between two buildings and accessibility) stainless and copper piping on metal supports, and friction and travel against fixed support for stressage and wear."

I hesitated to write this letter, one...because I realize that none of the reports is more than heresay, and two...because my experience with NRC staff over the

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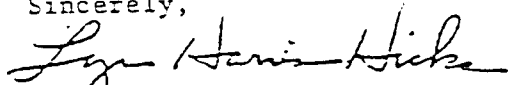
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Hicks letter continued.

years has been one of frustration and dismay that the staff generally operates as a support-arm to the applicant, arguing the applicant's case, apologizing and defending the applicant, changing the regulations and postponing the deadlines to accommodate the applicant. My disappointment in the NRC staff attitude adversary to us (GUARD) almost to the extent of hostility, has been deep and distressing. We really should be allied in our objects of identification of safety inadequacies and our goal of protection of the millions of citizens in the hazard zones of San Onofre.

So...I am grateful for your conscientious action at Diablo. It has renewed my faith in your intent to responsibly conduct San Onofre regulation and determinations. Thank you.

Sincerely,



Lyn Harris Hicks

Hicks

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