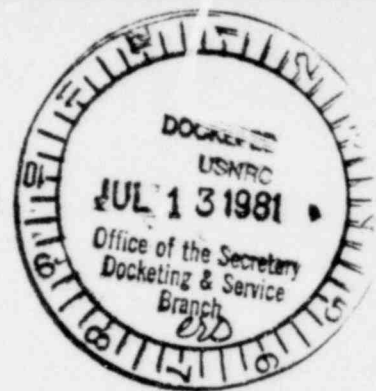


RELATED CORRESPONDENCE

BEFORE THE NUCLEAR REGULATORY COMMISSION

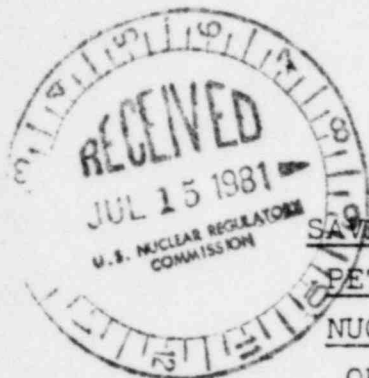
WASHINGTON, D. C.

COMMISSIONERS, Joseph M. Hendrie, Chairman,
Peter A. Bradford
Victor Gilinsky
John F. Aherne



7/10/81

IN THE MATTER OF PUBLIC SERVICE
COMPANY OF INDIANA, MARBLE HILL
NUCLEAR POWER PLANT, DOCKET NOS.
STN 50-546 AND STN 50-547



SAVE THE VALLEY'S ADDENDUM TO ITS APRIL 14, 1981
PETITION TO THE COMMISSIONERS TO REVIEW THE
NUCLEAR REGULATORY COMMISSION MARCH 27, 1981
ORDER TO RESUME CONSTRUCTION AT MARBLE HILL

Comes now Save The Valley (STV), by its attorney, and for cause of Addendum to the above Motion, states:

1. That on or about June 26, 1981, Victor Stello, Jr., Director of Inspection & Enforcement, filed his decision under 10 CFR 2.206 substantially accepting that the Marble Hill concrete in the aggregate does meet Nuclear Regulatory Commission (NRC) structural integrity criteria of 95% reliability and 95% confidence.
2. That on or about June 25, 1981, there was prepared by Alfred L. Parme, Consulting Engineer, La Jolla, California, and Roland C. Hamme, P.E., San Diego, California, a certain Review of the Evaluation of Concrete at Marble Hill Nuclear Generating Station, Units 1 & 2, Report #IE-124, which Report substantially concluded that the Marble Hill concrete meets the NRC requirements of 95% reliability and 95% confidence level.

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3. That said Alfred L. Parme and Roland C. Hamme did not include in their evaluation consideration of the effect of the slightest possible human error in the determination of R. Muneow; further, it is stated on page 13 of the report, "As a result of discussions with R. Muneow and others who are reputable, experienced and presently involved in the field of microseismic testing, we have concluded that the method of non-destructive testing performed at Marble Hill is acceptable. The interpretations made and equipment used by R. Muneow are at the forefront of the state of the art."

4. Again, Doctor Muneow's qualifications are not questioned; however, the particular task that he performed is an art and not a science and, therefore, cannot be given a qualification rating of 100%. Taking a qualification rating of 99% and placing said value on R. Muneow, the statistical basis for the NRC conclusion of 95% confidence with 95% reliability falls apart.

5. STV has presented a written critique of the section "Statistical Basis for Testing Program" by Suraj M. Alexander, Ph.D., P.E., Asst. Professor of Engineering Management/Industrial Engineering, Speed Scientific School, University of Louisville, addressing this statistical determination and concluding without question that the NRC determination is inaccurate, incorrect and even unintelligible; that Professor Alexander is highly qualified in the area of quality control with an in-depth background in statistics.

WHEREFORE, Save The Valley respectfully requests the Commissioners prior to the time that the 10 CFR 2.206 decision of Victor Stello, Jr. becomes the final action of the agency to institute a review of said June 26, 1981 decision, to order the independent engineers to be prepared to testify before the Commission in Washington, D.C. to defend their statistical determination of 95% confidence and 95% reliability; the Commission is further requested to order Save The Valley to present its witnesses personally before said Commission to defend its conclusion that said 95% confidence and 95% reliability has not been demonstrated by the NRC concerning the Marble Hill concrete.

RESPECTFULLY SUBMITTED,

SAVE THE VALLEY, PETITIONER

BY:

Thomas M. Dattilo

THOMAS M. DATTILO, ATTORNEY FOR
PETITIONER

311 EAST MAIN STREET
MADISON, INDIANA 47250
PHONE: 812-265-6355

DATED: JULY 10, 1981.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Addendum has been mailed to the following persons by regular U.S. mail, postage prepaid, this 10th day of July, 1981:

Peter A. Bradford, NRC, Washington, D.C. 20555

Joseph M. Hendrie, NRC, Washington, D.C. 20555

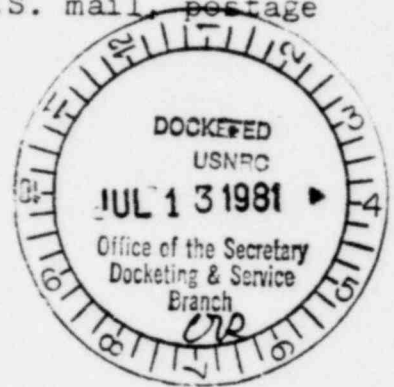
Victor Gilinsky, NRC, Washington, D.C. 20555

John F. Aherne, NRC, Washington, D.C. 20555

James Keppler, NRC, Roosevelt Rd., Glen Ellyn, Ill.

James Pope, Public Service Company of Indiana, 1000 E. Main St.,
Plainfield, Indiana 46168

NRC Docketing Section, Washington, D.C. 20555



Thomas M. Dattilo
THOMAS M. DATTILO