

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

COMMONWEALTH EDISON COMPANY)

LaSalle County Nuclear)
Generating Station, Unit 1)

Docket Nos. 50-373
and
50-374

AMENDMENT TO REQUEST
FOR SHOW CAUSE PROCEEDING

The People of the State of Illinois (Illinois), by
TYRONE C. FAHNER, Attorney General of the State of Illinois, in
further support of Illinois' Request to Institute Show Cause Pro-
ceeding and For Other Relief, filed March 24, 1982, submit the
following additional allegations of reinforcing steel damage in
the construction of the LaSalle County Nuclear Station, relating
specifically to the primary containment structure.

1. On April 29, 1982 the Office of the Attorney General of
Illinois received copies of the affidavits of three construction
workers, who state that the core drilling of holes through rein-
forcing steel (rebar) occurred in the primary containment walls
and in the reactor pedestal of LaSalle Unit 1 and/or Unit 2.
Prior to receiving these affidavits, Illinois had no information
relating the previously alleged rebar cutting practices to the
primary containment structure.

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2. Illinois is informed by the Government Accountability Project of the Institute for Policy Studies that the affidavits of four LaSalle Station construction workers are being submitted to James G. Keppler, Regional Administrator of Region III, U.S. Nuclear Regulatory Commission (NRC). Of the four affidavits, Illinois understands that two are being submitted subject to a commitment by Mr. Keppler not to disclose the identities of the two respective affiants. The identities of the remaining two affiants are not being kept confidential. At the time of filing of this Amendment to Request for Show Cause Proceeding, Illinois has no knowledge of the identity of the two affiants whose identities are to be protected by the NRC. All identifying information had been deleted from the copies of these two affidavits before they were made available to the Office of the Attorney General of Illinois. Of the four affidavits mentioned in this paragraph and reportedly in the possession of the NRC, three will be discussed here only to the extent that they bear directly upon the pending request for a show cause proceeding.

3. The first unidentified affidavit, dated April 21, 1982, consisting of 3 pages, states in pertinent part:

From personal observation I can confirm that several years ago around 1,000 holes were core-drilled into the containment wall and the reactor vessel pedestal around the 694 foot elevation of Unit I at the LaSalle plant. Construction crews core-drilled right through the reinforcement bars. . . [W]hen I left they had not replaced or repaired the reinforcement bars they cut through.

Walsh core-drilled right through the reinforcement bars ("rebars") in the reactor pedestal and containment wall concrete. I know these facts, because I personally observed the work. Further, last week I confirmed the number of holes with the guys who'd did the work.

5. A third affidavit, signed by Dennis Wayne Swartz, who worked at the LaSalle site from 1973 to 1982, states in pertinent part:

Probably the most serious construction deficiencies that I personally observed occurred during a February-March 14, 1980 stretch that I worked at LaSalle. The flaws involved the concrete in the containment wall and the reactor pedestal. We were helping to install supports for large tubes that came out of the suppression pool between the reactor pedestal and the containment wall. Chicago Bridge and Iron cut out stainless steel panels and then the concrete was core-drilled to install the supports. I personally saw holes at least a foot to twenty inches deep being drilled into the containment at the 710 foot elevation. In the process, many of the reinforcement bars were severed. I personally saw a half dozen rebars severed on each of two or three occasions during the first few days of core-drilling. (emphasis supplied)

The shattered rebars is [sic] not limited to the pedestal. I saw rebars severed all over the plant during core-drilling.

6. The above-quoted statements indicate that the practice of severing reinforcing steel during core drilling was probably more widespread as to the primary containment than was assumed or taken into account during the presentation of Edison to the NRC on March 31, 1982. On that day the following statements were made

on the subject of the primary containment, as reflected in the transcript:

A. Mr. Reklaitis (Sargent & Lundy):

We had some holes in the containment walls, a few holes, but they were not true through holes through the walls. They were for expansion anchors up to 6 inches deep and maybe one inch in diameter. (Transcript, p. 60)

[Edison's "clarification" of the first sentence of this remark, in Comments submitted to the NRC Division of Licensing with a letter from C. W. Schroeder dated April 22, 1982, is as follows:]

We had some expansion anchor holes in the containment wall. There were no core holes through these walls. (Edison Comments, at p. 4)

B. Mr. DelGeorge (Edison):

No reference was made to primary containment that I can remember. (Transcript, p. 61)

C. Mr. Denton (NRC Director of Nuclear Reactor Regulation):

I had assumed the reference was to so-called secondary containment, not primary containment (Transcript, p. 60-1)

7. The above statements indicate that the pending concerns about rebar damage have thus far been limited to buildings other than the primary containment. Also, the initial allegations of rebar damage were limited to the work and procedures of the electrical contractors, and did not extend to the general construction or reactor controls contractors.

8. Because of these initial limitations on the scope of the allegations and on the scope of the present inquiry, Edison represented to the NRC that "over the full course of the five percent power license that we have requested, . . . the radiation levels in those areas of the plant subject to inquiry here would not be such that continuing review or inspection would be precluded."

(Transcript, March 31, 1982, p. 73, DelGeorge) Thus it appears that the NRC's decision of April 17, 1982 to grant Edison a limited operating license, for fuel loading and zero power physics testing at LaSalle Unit 1, may have been based on the fact that the alleged concerns over the integrity of safety related structures did not extend to the primary containment. And concomitantly it appears that the NRC's current investigation into the extent and impact of rebar damage does not extend to the primary containment walls or to the reactor pedestal.

9. In view of the new allegations of rebar damage in the primary containment structure, which have been brought to the NRC's attention by the Government Accountability Project of the Institute for Policy Studies, the scope of the NRC's investigation of the alleged potentially hazardous condition at LaSalle Units 1 and 2 must be expanded. At the very least the investigation should include the primary containment structure. Preferably, the investigation should encompass all safety related structures and installations which involved core drilling in concrete.

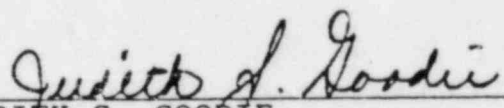
For the reasons stated above, the People of Illinois respectfully request that the NRC and the Director of Nuclear Reactor Regulation, as part of the NRC's consideration of Illinois' Request to Institute a Show Cause Proceeding, investigate thoroughly the extent of the rebar damage in all safety related structures, and particularly the primary containment, prior to granting to Edison the authority to conduct low power testing beyond initial criticality and up to five percent power.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

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BY:


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DATED: May 3, 1982.

PROOF OF SERVICE

I, HARRY HARRIS, being sworn and under oath do state that on May 3, 1982, I served the foregoing Notice of Filing and Amendment To Request For Show Cause Proceeding upon the persons to whom said Notice is addressed, by first class mail, postage prepaid, except that Director Denton was served by express mail at the U. S. Postal Service, 160 N. LaSalle Street, Chicago, Illinois 60601.

SUBSCRIBED and Sworn to
before me this 3rd day
of May, A. D., 1982.

Notary Public