

GOVERNMENT ACCOUNTABILITY PROJECT

Institute for Policy Studies
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November 12, 1982

Mr. Harold P. Denton
Office of Nuclear Reactor Regulation
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: C.F. Braun Independent Audit
La Salle Nuclear Power Plant

Dear Mr. Denton:

On November 9, 1982, we received a four volume report of the C.F. Braun Company's independent analysis of the heating, ventilation, air conditioning system at the La Salle Nuclear Power Plant in Illinois.

As you know, we have given a high priority to our concerns about the La Salle plant. This independent analysis is the result of concerns that we brought to the NRC commissioners in July 1982 on behalf of Mr. Terry Howard and Sharon Marelo. These former employees of the Zack Corporation in Chicago paid dearly for their efforts to insure the safety of the La Salle plant. They remain unemployed since notifying the Consumer Power Company's Quality Assurance Department in April 1982.

Previous to our presentation of the Zack allegations in April 1982, GAP provided six other affidavits to the NRC from witnesses to problems at the La Salle plant.

We understand that the plant is now operating at 48% power and only NRR staff approval of the C.F. Braun audit is delaying full power operation. Based on our initial analysis of the C.F. Braun report, we believe that the NRR's approval must wait for an in-depth review of the serious quality assurance breakdown, as well as HVAC system weaknesses at the La Salle plant. To do otherwise would not be prudent.

Your office requested that we submit any comments no later than November 12, 1982, only three days after receiving the eight inches of documents. Obviously, we cannot meet this deadline. A comprehensive and complete analysis of this data will take us, at a minimum, several days for our full time review and research. We have rearranged our schedules to devote adequate time early next week. We hope to complete our review and analysis by November 19, and sooner if possible.

Boo!

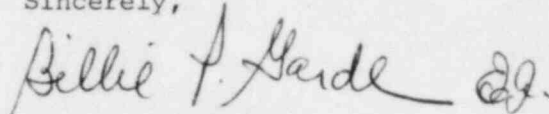
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Given the lengthy delays already involved in this program and the serious implications if this report is prematurely accepted we also believe it would be unreasonable for the NRC to proceed without our analysis.

For your information, our initial reaction to this report is one of disturbance. The report seems to raise more questions than it answers. We hope to find those answers in our study of the four volumes.

We question the optimistic conclusions of the C.F. Braun Management Review Team, for those conclusions do not seem to match the raw data or the findings. We will reserve judgement until our expert witnesses, analysts, and legal staff members complete their work.

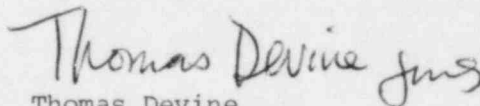
Sincerely,



Billie P. Garde

Director

Citizens Clinic for Accountable Government



Thomas Devine

Legal Director

BPG/ea

cc: Mr. Darrell Eisenhut
Director, Division of Licensing

Mr. Anthony Bournia
Project Manager