

HARMON & WEISS

1725 I STREET, N.W.

SUITE 506

WASHINGTON, D. C. 20006

GAIL MCGREEVY HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
LEE L. BISHOP
DIANE CURRAN
LYNNE BERNABEI
LUCIA S. ORTH

TELEPHONE
(202) 833-9070

OF COUNSEL
L. THOMAS GALLOWAY

May 24, 1982

Dr. Nuzio Palladino
Chairman
Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket Numbers STN 50-528
STN 50-529
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Dear Dr. Palladino:

I am writing to respond to the May 11, 1982, letter of Arizona Public Service Company Vice President Thomas Woods in which Mr. Woods requested and NRC investigation of Intervenor Patricia Lee Hourihan's allegations about deficiencies in the electrical systems at Palo Verde.

As attorney for Ms. Hourihan, I am today submitting a motion to the Licensing Board for leave to file new contentions concerning serious deficiencies in the electrical work related to the safety systems at Palo Verde, and falsification of reports on this electrical work. We seek also an order from the Board protecting from disclosure the identity of the worker who has sworn to a detailed affidavit about these deficiencies vitally affecting the plants' safety.

Ms. Hourihan did not believe it appropriate to raise these issues in the licensing proceeding before she had an opportunity to protect this man, who has already received a death threat on his life, and before she could at least partially substantiate the very serious, safety violations he alleged.

After obtaining an affidavit from the worker and consulting with other experts about the soundness of his charges, Ms. Hourihan, through the normal channels of the licensing proceeding, moved that the Licensing Board admit new contentions and order an independent investigation of these

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allegations.

Ms. Hourihan is not using these serious allegations as a "delaying tactic." Quite to the contrary, she wishes to protect the safety of the worker, who has turned to her (and not to APS) in the hope of seeing his charges brought before and carefully examined by the Licensing Board.

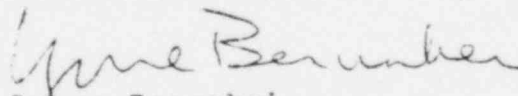
As explained in Intervenor's Motion for Leave to File New Contentions, the worker had previously been rebuffed by both the NRC inspector on-site and the NRC Las Vegas office. On several occasions he asked APS supervisors to remedy deficiencies in the electrical systems and to stop falsification of records. He was told not to worry because the quality assurance inspectors would catch the problems. Because some of the records on electrical work were falsified, however, the quality assurance program cannot possibly detect all these deficiencies. In addition, Vice President E.E. Van Brunt's office showed little interest in the worker's complaints.

Moreover, it is Intervenor and not APS who is most concerned about protection of this man's life. He has said in his affidavit that he and other workers fear being blackballed from work at all nuclear plants if they are identified as troublemakers. In addition, after a death threat he fears further harassment of himself and his family if his identity becomes public.

Because of the lack of response from APS and the NRC the worker spoke to Ms. Hourihan about his concerns about the safety of the plant. Ironically, APS seems more concerned with finding out the man's identity and the specifics of the charges than with ensuring open litigation of the safety issues before the Licensing Board. In their attempt to rush these licensing hearings to completion, for example, Joint Applicants, including APS, have opposed Intervenor's attempts to address serious issues about the adequacy of their water supply for safe operation and shutdown of Palo Verde.

If now Joint Applicants are truly interested in a constructive airing of these allegations about deficiencies in the electrical systems and falsification of records, I would expect they too will support Intervenor's Motion to Add New Contentions and Request for an Independent Investigation.

Sincerely yours,


Lynne Bernabei

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Dr. Palladino
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cc: Governor Bruce Babbitt

Robert M. Lazo, Esq.
Chairman
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Richard F. Cole
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Dixon Callahan
Union Carbide Corporation
P.O. Box Y
Oak Ridge, Tennessee 37830

Lee Scott Dewey, Esq.
Office of Executive Legal Director
U.S. Regulatory Commission

Rand L. Greenfield, Esq.
Assistant Attorney General
P.O. Drawer 1508
Santa Fe, New Mexico 87504

Arthur C. Gehr, Esq.
Charles Bischoff, Esq.
Snell & Wilmer
3100 Valley Bank Center
Phoenix, Arizona 85073

Honorable Barry Goldwater
Honorable Dennis DeConcini
Honorable John J. Rhodes
Honorable Eldon Rudd
Honorable Bob Stump
Honorable Morris K. Udall

Dr. Harold Denton

Arizona Corporation Commission
Bud Tims, Chairman
Diane McCarthy, Commissioner
Jim Weeks, Commissioner
Tim Barrow, Executive Secretary