

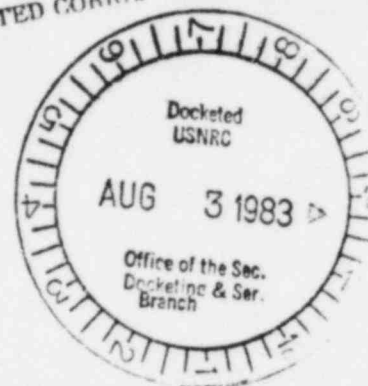


# AIR and WATER Pollution Patrol

BROAD AXE, PA.

July 27, 1983

RELATED CORRESPONDENCE



U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Washington, D.C. 20555

Judge Lawrence Brenner, Judge Richard Cole, Judge Peter Morris

In The Matter of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station, Units 1 and 2)  
Docket Nos. 50-352 and 50-353

Gentlemen:

Enclosed are comment and questions re possible loss of strength of epoxy grout used at Limerick, and burial of radioactive wastes from Limerick. Also included is copy of letter to Applicant's counsel Wetterhahn.

Very truly yours,  
AIR & WATER POLLUTION PATROL

Frank R. Romano, Chairman  
61 Forest Ave.  
Ambler, Pa. 19002

FRR/jch

I hereby certify that copies have been served by First Class Mail to: Lawrence Brenner; Richard F. Cole; Peter A. Morris; Atomic Safety and Licensing Appeal Panel; Docketing and Service Section; Ann P. Hodgdon, Elaine I Chan; Atomic Safety and Licensing Board Panel; Philadelphia Electric Company, Edw. G. Bauer; Mark J. Wetterhahn; Troy B. Conner; Robert L. Anthony\*; Marvin I Lewis\*; Judith A. Dorsey; Jackie Ruttenburg, Keystone Alliance\*; Thomas U. Au; \*Thomas Gerusky; Walter W. Cohen\*; Managing Director Phila.\*; Steven P. Hershey\*; Donald S. Bronstein\*; Joseph White\*; Dr. Judith Johnsrud\*; Robert J. Sugarman\*; James M. Neill\*; Director PEMA\*.

\* without enclosure

8308040283 830727  
PDR ADOCK 05000352  
G PDR

DS03

# AIR and WATER Pollution Patrol

BROAD AXE, PA.

June 29, 1983

Conner and Wetterhahn  
1747 Pennsylvania Ave., N.W.  
Washington, D.C. 20006

In The Matter Of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station, Units 1 & 2)  
Docket Nos. 50-352 & 50-353



Dear Mr. Wetterhahn:

Re your letter to me of July 25, 1983, as later discussed with you by telephone, I will, follow the same procedure Applicant required relative to copies of documents requested, namely, mark what specific parts or complete document you want. I will then take them to a commercial copier nearby and you can pickup and pay ten cents per copy.

As it relates to the July 12, 1983 second round interrogatories on Contention V-4 objections re "n", "q" and "u" re wind shear, I contend wind shear is relevant to carburetor icing because in shear the pilot would suddenly be fighting to prevent loss of control of the aircraft as I personally know from a recent accident.

Reduction of throttle would be instinctive, but a pilot not familiar with the localized and unsuspected higher humidity within the plume area of Limerick would, in fighting to maintain control, have no time to adjust fuel mixture, flap settings, scan panel readings, or apply carburetor heat, etc. As a result reduced throttle could cause ice in the carburetor with potential for crashes.

As it relates to your reply to my request for data on specific tests without which the Applicant could not assure hazards from carburetor ice (3rd par. 7/25/83 letter), no where in the documents you supplied under informal discovery was there answers to these specific questions I asked which involved conditions specifically at Limerick. Further your statements that it would involve too much work for you to provide specific, factual, relevant, and critical information cannot be made an attempt to transfer the burden to me, or to otherwise neglect to supply the requested information. The rules of the Commission are paramount in such matters to insure no part of your activity results in injury or death.

Re your last paragraph, I find it difficult to believe the Applicant can undertake to build nuclear reactors but it is too much to supply calculations, for instance to questions like what percentage of airplanes based within ten miles of Limerick are without carburetor ice indicating instruments.

By that type of refusal, the Applicant has not provided answers to at least twenty questions...and then concludes that "it is impossible to reach resolution of our differences regarding (F.R.) discovery request."

If the very pertinent information is obtained by the Applicant and forwarded to Air & Water Pollution Patrol, it will help to determine the necessary facts of the situation.

Sincerely,  
Frank R. Romano, Chairman  
Air & Water Pollution Patrol

FRR/jch

I certify that the Service List has been served by First Class Mail.



# AIR and WATER Pollution Patrol

BROAD AXE, PA.

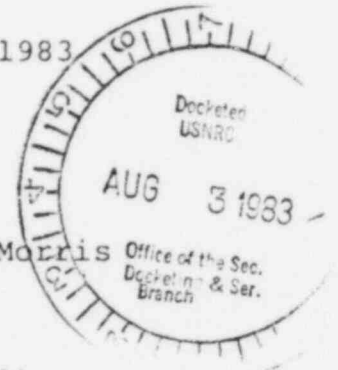
July 27, 1983

RELATED CORRESPONDENCE

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Washington, D.C. 20555

Judge Lawrence Brenner, Judge Richard Cole, Judge Peter Morris

In The Matter Of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station, Units 1 and 2)  
Docket Nos. 50-352 and 50-353

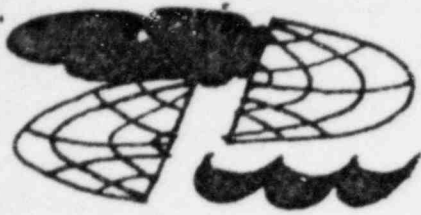


Gentlemen:

Air and Water Pollution Patrol's 2nd set of requests for documents re quality control and quality assurance contention VI-I.

- Item 50: Please provide documents re tests done by Applicant re neutron shielding, in particular copy of 12.3.2.6 of LGS-FSAR and how neutron shielding relates thereto.
- Item 51: Please provide correspondence between staff and Applicant re neutron shielding involving the control rod drive (CRD) removal hatch openings.
- Item 52: Provide literature on written description of epoxy grout used by Applicant everywhere in the construction of LGS Units 1 and 2.
- Item 53: Provide documents indicating locations and amounts of epoxy grout applied (weight and volume) in void repair of dry well wall Unit 1 reactor.
- Item 54: Please provide records on amount of epoxy grout used in the CRD hatch opening areas.
- Item 55: Please provide reports on quality assurance (including neutron effects) as to strength VS. time as to creep characteristics of epoxy grouts used at Limerick in particular, in the CRD hatch openings.
- Item 56: Re strength-creep tests, provide records of test dates, who made the tests, qualifications of testers, and results.
- Item 57: Re item 56 provide documents re test procedures, parameters tested, and umpire testing by an independent corroboratory testing entity.
- Item 58: Provide documentation re quality assurance and control on suitability of packed radioactive wastes discussed in PECO & NRC Conference call dated May 5, 24, and June 8, 1983 as to burial location, effect on ground water, and safety for full radioactive life.

Sincerely,  
Frank R. Romano  
AWPP



# AIR and WATER Pollution Patrol

BROAD AXE, PA.

July 27, 1983

RELATED CORRESPONDENCE

U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Washington, D.C. 20555

Attn: Edward L. Jordan, Director  
Division of Emergency Preparedness  
and Engineering Response



Gentlemen:

12.3.2.6 of LGS-FSAR re "Outside Drywell Structure" discusses need for neutron shielding in the Personnel access and equipment removal areas and CRD removal hatch openings.

It further states that high density concrete must be used for neutron shielding in such "large openings in the drywell wall".

This is the same area where massive voids were produced by improperly placed, and improperly mixed concrete and resulting damage done to rebar during removal of faulty concrete.

More particularly, because of the nature of the area of the CRD...grout, and epoxy material were used as repair replacement.

Please advise if grout-concrete substitutes such as the epoxy grout used at Limerick is qualified re neutron shielding. Further the June 22, 1983 IE Information Notice No.83-40: "Need to Environmentally Qualify Epoxy Grouts and Sealers", states that TVA has halted use of epoxy grout and is analyzing those grouts used earlier because of loss of strength due to creep in the epoxy grout.

Please supply assurance of quality through reports of periodic verification of strength characteristic of the epoxy grout used in the drywell wall of the Limerick Unit 1 and 2 reactors.

Please provide documentation re epoxy brand name, manufacturer, and test dates with results.

Sincerely,  
AIR & WATER POLLUTION PATROL

Frank R. Romano, Chairman  
11 S. Ridge Ave.  
Ambler, Pa. 19002

FRR/jch