



AIR and WATER Pollution Patrol

BROAD AXE, PA.

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USNRC

May 25, 1983⁸³ AUG 11 P2:25

Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Lawrence Brenner, Chairman
Washington, D.C. 20555

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

Lawrence Brenner, Chairman; Dr. Richard F. Cole; and Dr. Peter A. Morris

Gentlemen:

This letter is being submitted in response to letter of May 20, 1983 from Mark J. Wetterhahn, Counsel for the Applicant re: IE Report No. 50-353/76-06. I want to state at the start that the documents submitted to me by Mr. Wetterhahn, do not at all, quoting Mr. Wetterhahn's letter: "demonstrate that all suspect welds, rather than those which were merely accessible, were re-inspected."

The third paragraph of Mr. Wetterhahn's May 20 letter referring to Finding report No N-093, inter alia, and NCR report 1980 has to do with the welds which were found deficient by the NRC inspector after they were certified acceptable by the inspector of the Applicant and Bechtel's inspector. Nowhere does the report explain how and when the inaccessible welds were discovered first and, secondly, made accessible and, thirdly, re-inspected completely, as inferred.

In Mr. Wetterhahn's fourth paragraph he discusses Finding Report N-093 which he writes, quote: "requires a re-inspection of all other accessible welds inspected by the inspector who accepted the deficient welds referred to in NRC I&E Report No. 50-353/76-06." Since report N-093 has only to do with "accessible" welds, it does not solve the question of inaccessible welds (emphasis by Romano).

Mr. Wetterhahn's fifth paragraph discusses Bechtel Field Inspection Report control Nos. C-63-20 and C-63-21 dated Jan. 17, 1977 (attachment 7). Whereas per Appendix A, Notice of Violation under A, Report No. 50-353-76/06, it is stated the deficient welds were at elevation 253, columns 23G and H, Inspection report C-63-20 and C-63-21 above refer to "control room, elevation 269 and 289, Area 8; and reactor building Unit 2, elevation 257 to 264" respectively. Further, 76-06-01 headed "Failure to weld structural Steel per AWS Code" mentions elevation 283, Area 13 and elevation 253, columns F and H at wall 23. Because of confusion, Applicant must supply the name of the Bechtel and Applicant's inspectors, together with inspection records with their signatures and dates before specific and precise number of welds and locations can be proven accessible or inaccessible. For the Applicant to provide statements in the fifth paragraph alleged to actuate specificity, and then refer to welds which were, quote: "possibly inspected by the particular Bechtel Quality Control Inspector involved" indicates uncertainty totally nullifying specificity. (emphasis by Romano). It is important also for the complete record that the names of the inspectors in the "broomstick" incident (50-353/76-06) with work records at the time of the incident, to the present. These were not made available to me.

Further, as it relates to the sixth paragraph, reference to Bechtel Field Inspection Report Control No. C-63-22 dated April 4, 1977 (Applicant means April 5, 1977?)

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the report, at 6, indicated quote: "Type of Inspection...Visual". Certainly a visual inspection cannot inspect ⁽¹⁾concrete-embedded or otherwise non-visible welds. Further, the inspection was, quote:"of installed structural steel, beams, and columns to determine its accessibility for inspection." Nowhere is it shown that report C-63-22 reports on accessible or inaccessible welds caused by scaffolding or otherwise. I ask applicant to supply date that scaffolding was removed in that specific area. Since inspection of 4/5/77 is six months after the "broom-stick" deficient welds incident, it seems, because of the seriousness of the incident, that ⁽²⁾inspection of welds by the inspectors involved should have been made immediately after the incident.

Paragraph seven of Mr. Wetterhahn's letter again refers to Report C-63-22 together with related items in the summary of Page 8 of 8, mention is made of, quote: "the particular Quality Control Inspector..." In actuality, however, there were two inspectors who were involved in falsely O.K.ing deficient welds in the 50-353/76-06 incident. It is for the Applicant also to explain why the serious question of repeated failure to perform welding as per specified AWS code on Oct. 16, 19-22, 1976 was allowed to remain unre-inspected as to accessibility until July 1977. *Assadants that such inspections were done must be made with inspection reports attached.*

As it relates to eighth paragraph, Field Inspection Reports Nos. C-63-30, 31, 32, and C-41A-493, do not provide proof of inspection of inaccessible welds. In fact those reports prove inaccessible welds, as stated, cannot receive a full inspection because of being imbedded in concrete. Nevertheless the Applicant states NCR-2710 explains how, in spite of being imbedded in concrete, the welds are declared acceptable...but does not provide the manner by which the unsubstantiated conclusion that welds were acceptable on the basis that, quote:"...the embedded portion of the weld was non-existent..." It seems the inaccessible welds were declared, capriciously and unilaterally, acceptable on the convenient and unscientific declaration that welds that cannot be re-inspected because they cannot be made accessible are, therefore, acceptable. Public safety demands Philadelphia Electric to categorically prove its statement (2nd Paragraph of Mr. Wetterhahn's May 20 letter), quote: "...that all suspect welds, rather than those which were merely accessible, were reinspected." P.E. must also prove that all welds, accessible and inaccessible were not just inspected but were acceptable. ⁽⁴⁾

Sincerely, AWPP

Frank R. Romano, Chairman

First class mail service to: Richard F. Cole, Peter Morris, Atomic Safety & Licensing Appeal Panel; Rocketing and Service Section; Ann P. Hodgdon, Elaine I. Chan; Atomic Safety & Licensing Board Panel, Phila. Electric, EDU G. Bauer; Robt. L. Anthony; Marvin Lewis; Judith Dorsey; Charles Elliott; Alan J. Nogee; Thomas Y. Au; Thomas White III; Judith Johnsrud; Robt. Sugarman; James N. Neill; Director PEMA; Trob B. Conner, Jr.; Mark J. Wetterhahn.

(1) determine quality of welds

(2) hidden

(3) who could detect welds

(4) met all AWS codes.