

AIR and WATER Pollution Patrol

BROAD AXE, PA. Dec. 7, 1983

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In The Matter of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station
Units 1 and 2)

Docket Nos. 50-352
and 50-353

Gentlemen:

It must be evident that there is a physical impossibility in the changed time allotted to complete discovery re Contention VI-1. This is compounded by the manner in which the Applicant is not fully co-operating with our interrogatories.

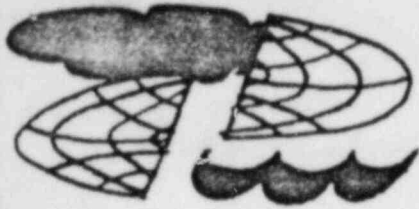
Enclosed are interrogatories submitted to Applicant on dates shown. As can be seen by our initial Nov. 11, 1983 request, we asked for specific material that will not require searching through voluminous records.

Applicant has crates and crates full of various records (re purchases, concrete, electrical, equipment, heaters, etc.) which in effect creates a barrier re time available to our effort to obtain a complete record re the VI-1 Contention.

Inasmuch as AWPP has already shown the "Applicant has failed to control performance of welding and inspection thereof in accordance with quality control and quality assurance procedures and requirements, and has failed to take proper and effective corrective actions when improper welding has been discovered", (the very wording of AWPP's Contention VI-1) the Applicant must be ordered, as AWPP (Romano) so moves, to facilitate (rather than complicate) and bring forth the specific information, documents, etc. requested in Nov. 11, 1983 Request and Nov. 23, 1983 Second, and Third Request (enclosed).

On the other hand the nature of the "363-76-06 affair" is a specific example of illegal submission of false statements to a Fed-

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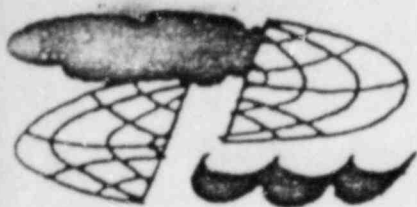
eral Agency, which is punishable by law. I move, therefore, that the Nuclear Regulatory Commission through personnel and/or funds seek additional evidence which might otherwise not come to light except by an accident with tragic consequences.

Respectfully submitted
AIR & WATER POLLUTION PATROL

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

FRR/jch

I certify the latest Service List has been served.



AIR and WATER
Pollution Patrol
BROAD AXE, PA.

Nov. 11, 1983

Troy B. Conner, Jr. Esq.
Conner and Wetterhahn
1747 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Dear Mr. Conner:

Pursuant to the Board's Order concerning formal discovery, Air and Water Pollution Patrol requests the following re Contention VI-1 (Quality Assurance/Control). AWPP requests specific material that will not require searching through voluminous records.

(1) Provide all correspondence or telecon records from the Nuclear Regulatory Commission or any of its agencies, for example, Inspection & Engineering (IE), to Applicant, and Applicant's response(s) directly or indirectly relating to welding infractions at Limerick from 1974 to present.

(2) Provide all correspondence or telecon records from NRC, to and from Bechtel Corporation re welding infractions (including Bechtel sub-contractors).

(3) Provide all documents, work records, and correspondence from the NRC, via IE reports on welding infractions in which "use as is" disposition was used with or without NRC approval.

(4) Re 76-06-01*, give names of craft and supervision personnel that "revealed plan to perform welding with the electrode fastened to a broomstick". * (NRC-IE 76-06-01-Failure to Weld Structural Steel Per AWS Code.)

(5) Re 76-06-01 give names of licensee, and contractor Q.A. and Q.C. personnel who confirmed that welding was performed using broomsticks.

(6) Re 76-06-01 give name(s) of qualified and unqualified welders that used unqualified extensions above.

(7) Re 76-06-01, how many welds were performed at all locations detailed under 76-06-01?

(8) Did Applicant design and manufacture equipment as required by AWS, D-1-1-72, under Part 3.1.2 so as to enable qualified welders to meet the AWS Code?

(9) Under 76-06-01, what is the name of the person who is represented as the "licensee" who "disagreed" re need for "visual inspection of the limited access welds performed at elevation 253 on steel beam piece numbers 232B7"?

(9.5) Re 10 CFR 2.790 (a) and 2.790 (b) (1), supply all written applications asking to withhold information contained in NRC violations involving welding at Limerick.



AIR and WATER
Pollution Patrol
BROAD AXE, PA.

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Requests re Contention VI-1 (Quality Assurance/Control) continued:

(10) Under 76-06-01, how many welds were involved in "the weld joints designated #3 in the record drawings of the in-process check list"?

(11) Under 76-06-01, as it relates to (10) above, who was the Bechtel Quality Control inspector involved with checking off "all inspection items, including "Final Quality Verification"? Was he separated from employment by Bechtel and/or Applicant in 1976?

(12) Re 76-06-01, what part of QWS-D-1-1 Section 6 did the Quality Control inspector not comply with?

(13) Please provide following documentation re 76-06-01: QCIR-C-201-W-1-8; C-41A-515-3; QCIR-C-204-W-1-2; Q-41A-657-3; PI-A-Lh; Q.C. In-Process Check-Off-Sheet-Welding, C-201-W-1-8.

(14) Please provide affidavits from supervisors, and inspectors of P.E., NRC, and Bechtel that the infractions such as in 76-06-01 did not take place at other construction locations at Limerick.

(15) Re audits of welding quality records discussed under 5 (a), page 11, of Summary of Findings, Inspection 50-353-76-06, what audit findings did inspector observe that required that "corrective action was documented"?

Respectfully yours,
AIR AND WATER POLLUTION PATROL
Frank R. Romano
Frank R. Romano, Chairman
61 Forest Ave.
Ambler, Pa. 19002

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I certify the Service List has been served.



AIR and WATER Pollution Patrol

BROAD AXE, PA.

Nov. 23, 1983

U. S. NUCLEAR REGULATORY COMMISSION
Washington, D.C. 20555

Before the Atomic Safety & Licensing Board

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

In The Matter Of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station
Units 1 and 2)

Docket Nos. 50-352
and 50-353

AWPP's SECOND REQUEST FOR INFORMATION, DOCUMENTS, ETC.

As per hearing conference of October 17 & 18, 1983 (Tr. 4913-16)
relating to "welding" issue please provide following.

(1) Indicate total number of welds involved directly or indirectly* with safety-related piping, reactor vessel, reactor vessel components and all units into and out of the reactor vessel which require or required welding.


(2) Indicate the types of each weld performed and the name and proof of qualification of the welder who performed such weld or welds.

(3) Provide all radiographs of all welds in (1) above, or other physical tests or evidence re weld quality.

(4) Provide copies of all IE reports in which a safety-related welding infraction is discussed or described.

* Indirectly means welding done offsite, either a completed unit or a unit which is later welded to another unit at the Limerick site, as done with the reactor vessels at Limerick.

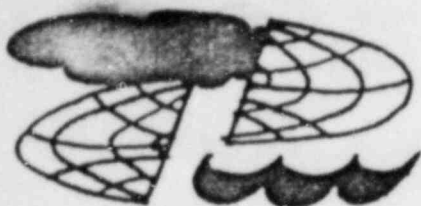
Very truly yours,
AIR & WATER POLLUTION PATROL


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

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I certify the above has been served on the Service List this date.

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AIR and WATER Pollution Patrol

BROAD AXE, PA.

Nov. 23, 1983

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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


In The Matter Of
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(Limerick Generating Station
Units 1 and 2)

Docket Nos. 50-352
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AWPP'S THIRD REQUEST FOR INFORMATION, DOCUMENTS, ETC.

As per hearing conference of October 17-18, 1983, (Tr 4913-16)
relating to welding issues please provide following:

- (1) Provide names of Licensee, Contractor, and NRC inspectors and welders who are indicated in all safety related welding deficiency or infraction reports or notices, so that Applicant can provide depositions and/or affidavits.
- (2) AWPP requests that Applicant provide date for a site visit for AWPP and representatives to see all actual repairs, and for Applicant to have AWPP and representatives witness Applicant's performance of re-inspection of deficient welds via non-destructive tests on same.
- (3) Indicate name of welders who, more than one time, were involved in reported deficient welds, and who never the less were not discharged or separated from work at Limerick.
- (4) Re 3 above, indicate those welders that were discharged or separated due to unacceptable welding performance or non-adherence to specified welding procedures.

Respectfully yours,
AIR & WATER POLLUTION PATROL

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

FRR/jch

I certify the above has been served on the latest Service List.

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